

Exhibit 5

PLAINTIFF DEKALB COUNTY SCHOOL DISTRICT'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA) Case No.
ADOLESCENT ADDICTION/) 4:22-md-3047-YGR
PERSONAL INJURY PRODUCTS)
LIABILITY LITIGATION) MDL No. 3047

_____)
This Document Relates to:)

DeKalb County School District)
v. Meta Platforms Inc., et al.)

Case No. 4:23-cv-05733-YGR)
_____)

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEO-RECORDED FACT DEPOSITION AND RULE 30(B)(6)PMQ
OF

DENISE REVELS

Beasley Allen Law Firm
2839 Paces Ferry Road SE, Suite 400
Atlanta, Georgia 30339
Friday, April 18, 2025, 9:09 a.m.

- - - -

Reported by: Karen Kidwell, RMR, CRR

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DeKalb-Revels Exhibit 2	Denise Revels, Ed.S., LCSW Curriculum Vitae	9
DeKalb-Revels Exhibit 3	Denise Revels End of Year Evaluation for 2023	11
DeKalb-Revels Exhibit 4	Plaintiff Fact Sheet - School Districts	23
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1	E X H I B I T S (Cont'd)		
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3	DeKalb-Revels Exhibit 6	Addressing the Mental Health Needs of Students/Staff and Parents, DeKalb County School District, Confidential, Bates DEKALB027542-544	105
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6	DeKalb-Revels Exhibit 7	4/30/2020 E-mail Denise Revels to Denise Revels, Confidential, Bates DEKALB059369	113
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9	DeKalb-Revels Exhibit 8	Document starts with "School social Workers", Confidential, Bates DEKALB059370	113
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11	DeKalb-Revels Exhibit 9	E-mail chain, top e-mail 2/1/2021 Kishia towns to Deborah Moore-Sanders and others, Confidential, Bates DEKALB622429-430	125
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15	DeKalb-Revels Exhibit 10	Chart What's in the SAFE Center?	156
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1	E X H I B I T S (Cont'd)		
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4		Division of Equity and Student Empowerment, Staff to Student Ratios for School Psychologists and School Social Workers, Confidential, Bates DEKALB063309-331	
5			
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20	REPORTER'S NOTE: All quotations from exhibits		
21	are reflected in the manner in which they		
22	were read into the record and do not		
23	necessarily indicate an exact quote from the		
24	document.		
25			

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1 ATLANTA, GEORGIA, FRIDAY, APRIL 18, 2025

2 P R O C E E D I N G S

3 - - -

4 VIDEOGRAPHER: Good morning. We are now
5 going on the record.

6 My name is Erik Nelson, and I'm a
7 videographer for Golkow, a Veritext division.
8 Today's date is April 18th, 2025, and the time
9 is 9:09 a.m.

10 This video deposition is being held at
11 2839 Paces Ferry Road SE in Atlanta, Georgia.
12 It's being taken in the matter of DeKalb County
13 School District vs. Meta Platform Incorporated,
14 et al., for the United States District Court,
15 Northern District of California.

16 Deponent today is Denise Revels. Counsel
17 will be noted on the stenographic record.

18 The court reporter, Karen Kidwell, will
19 now swear in the witness.

20 DENISE REVELS,
21 being first duly sworn, testified as follows:

22 EXAMINATION

23 BY MR. REINKE:

24 Q. Good morning.

25 A. Good morning.

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1 Q. My name is Adam Reinke, and I'm one of the
2 attorneys for the Defendants in this case, and I'll
3 be taking your deposition this morning.

4 Can you please state your name for the
5 record?

6 A. Denise Revels.

7 Q. You are currently employed by the DeKalb
8 County School District, correct?

9 A. Yes, I am.

10 Q. What is your current position?

11 A. I serve as the director of Wrap Around and
12 Student Support Services.

13 Q. And how long have you been in that
14 position?

15 A. Since 2022.

16 Q. I'm going to show you a document that
17 we'll mark as Exhibit 1, which is Tab 1.

18 (DeKalb-Revels Exhibit 1 was marked for
19 identification.)

20 BY MR. REINKE:

21 Q. If you could please take a moment to
22 review the document that I've marked as Exhibit 1,
23 and tell me if you recognize it.

24 A. Yes, I do.

25 Q. What is Exhibit 1?

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1 A. This is the notice that I was provided
2 with.

3 Q. For your deposition today?

4 A. Yes.

5 Q. And if you turn to page 6, there's a page
6 with a heading on the top that says "Exhibit A." Do
7 you see that?

8 A. Yes.

9 Q. And do you understand that this is a list
10 of documents that Defendants requested that you
11 search for and produce, either before or at your
12 deposition?

13 A. Yes.

14 Q. And did you provide any documents -- did
15 you search for any documents on this list?

16 A. Yes.

17 Q. And did you provide the documents that you
18 found to your attorneys?

19 A. Yes.

20 Q. I'm going to show you a document that
21 we'll mark as Exhibit 2, which is Tab 75.

22 (DeKalb-Revels Exhibit 2 was marked for
23 identification.)

24 BY MR. REINKE:

25 Q. If you could please take a moment to

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1 review the document I've marked as Exhibit 2, and
2 tell me if you recognize it.

3 A. Yes.

4 Q. And what is this document?

5 A. My résumé.

6 Q. Is this a document that you provided to
7 your attorneys in advance of your deposition?

8 A. Yes.

9 Q. And you provided it so your attorneys
10 could produce it to Defendants?

11 A. Yes.

12 Q. Did you personally draft this document?

13 A. Yes.

14 Q. And when was the last time you updated
15 this résumé?

16 A. I can't recall.

17 Q. Was it within the last two years?

18 A. Yes.

19 Q. We can set that aside for the moment.

20 Next I'm going to show you a document that
21 we'll mark as Exhibit 3. And this is Tab 80. I
22 don't have a printed copy of this document, so it
23 will just be on your screen.

24 (DeKalb-Revels Exhibit 3 was marked for
25 identification.)

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1 MR. REINKE: Can you zoom in on that a
2 little bit?

3 BY MR. REINKE:

4 Q. And if you could please take a moment to
5 review the document that is on your screen, which
6 we've marked as Exhibit 3.

7 If you'd like, we can scroll through the
8 document as well. Tell me if you'd like to scroll
9 through the document.

10 A. No.

11 Q. Okay. Do you recognize this document that
12 we've marked as Exhibit 3?

13 A. Yes.

14 Q. And is this a document that you provided
15 to your attorneys to produce to Defendants in advance
16 of your deposition?

17 A. Yes.

18 Q. And what is this document?

19 A. My end-of-the-year evaluation.

20 Q. For which year?

21 A. 2023, the year ending.

22 Q. And at the top it says "DKES Employee
23 End-Of-Year Assessment." Do you know what "DKES" is?

24 A. I can't -- I cannot recall the exact . . .

25 Q. Okay. Was this an evaluation that was

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1 done of you in connection with your employment by the
2 DeKalb County School District?

3 A. Yes, it was.

4 Q. Was there one person who performed your
5 evaluation, or more than one person?

6 A. One person.

7 Q. And who was that?

8 A. Kishia Towns.

9 Q. And what is Kishia Towns' position?

10 A. She's the chief of Wrap Around.

11 Q. Is she your direct supervisor?

12 A. Yes, she is.

13 Q. Are you represented by any attorneys at
14 this deposition?

15 A. Yes, I am.

16 Q. You are represented by the attorneys from
17 Beasley Allen who are present here today?

18 A. Yes, I am.

19 Q. Have you been deposed before?

20 A. No, I have not.

21 Q. Have you ever testified in court before?

22 A. Yes, I have.

23 Q. How many times have you testified in
24 court?

25 A. Approximately 40.

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1 Q. When was the most recent time that you
2 testified in court?

3 A. 2020.

4 Q. Was that in connection with your
5 employment by the DeKalb County School District?

6 A. No, it was not.

7 Q. Has any time that you testified in court
8 been in connection with your employment with the
9 DeKalb County School District?

10 A. Not that I can recall.

11 Q. Has any of your testimony in court, to
12 your recollection, related to social media?

13 A. No.

14 Q. Has any of your testimony in court, to
15 your recollection, related to student mental health
16 issues?

17 A. Yes, it has.

18 Q. Okay. Were these students of the DeKalb
19 County School District or some other school district?

20 A. Some other school district.

21 Q. And what school district was that?

22 A. Atlanta Public Schools.

23 Q. Has any of your testimony in court related
24 to student mental health for DeKalb County School
25 District students?

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1 A. I have not testified in court as an
2 employee of DeKalb County School District.

3 Q. Okay. So now none of your testimony has
4 related to student mental health at DeKalb County
5 School District?

6 A. I have not testified in court as a
7 representative of DeKalb County School District.

8 Q. Right. And what I'm trying to understand
9 is if you have testified in court in any other
10 capacity, in any way that's related to the mental
11 health of DeKalb County School District students.

12 A. I can't recall.

13 Q. Okay. You testified that -- you testified
14 that you testified in court approximately 40 times.
15 Were most of these times in connection with your
16 employment at Atlanta Public Schools?

17 A. Yes.

18 Q. And generally speaking, what type of court
19 testimony did you give in connection with your
20 employment at Atlanta Public Schools?

21 A. Testimony regarding truancy and child
22 welfare concerns.

23 Q. Are there any other subject areas that you
24 can recall testifying about as an employee of Atlanta
25 Public Schools?

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1 A. No.

2 Q. Have you ever given testimony before a
3 legislature or legislative committee?

4 A. Yes, I have.

5 Q. Okay. How many times?

6 A. Once.

7 Q. And when was that?

8 A. I can't recall the date.

9 Q. Was it within the last ten years?

10 A. I can't recall the date.

11 Q. Did the -- do you recall what legislature
12 or legislative committee you testified before?

13 A. The education committee.

14 Q. And was that for like the Georgia
15 legislature?

16 A. Yes.

17 Q. Was this during the time that you were
18 employed by the DeKalb County School District?

19 A. No, it was not.

20 Q. It was during the time you were employed
21 by Atlanta Public Schools?

22 A. Yes, it was.

23 Q. Do you recall generally what the subject
24 of your testimony was?

25 A. Yes.

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1 Q. What was it?

2 A. It was a -- in regards to advocating to
3 increase the number of school social workers across
4 the state of Georgia, to address mental health
5 concerns in schools.

6 Q. Do you recall mentioning social media at
7 all during your testimony?

8 A. No.

9 Q. Have you ever testified at any
10 administrative hearing?

11 A. No.

12 Q. Did you do anything to prepare for your
13 deposition today?

14 A. I met with the attorneys.

15 Q. Other than meeting with your attorneys,
16 did you do anything else to prepare for your
17 deposition today?

18 A. No, I did not.

19 Q. How many times did you meet with your
20 attorneys to prepare for your deposition?

21 A. Six times.

22 Q. Okay. And when, approximately, was the
23 first time?

24 A. The end of February.

25 Q. Was that meeting in person?

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1 A. Yes, it was.

2 Q. Approximately how long did that last?

3 A. About one hour.

4 Q. When was the next time, approximately,
5 that you -- that you met with your attorneys to
6 prepare for your deposition?

7 A. In March.

8 Q. And was that meeting in person?

9 A. No, it was not.

10 Q. Was it virtual?

11 A. Yes, it was.

12 Q. Approximately how long was that meeting?

13 A. About an hour.

14 Q. When was the third time that you met with
15 your attorneys to prepare for your deposition?

16 A. March.

17 Q. Was that a virtual meeting?

18 A. Yes, it was.

19 Q. And approximately how long did that
20 meeting last?

21 A. About an hour and a half.

22 Q. When was the fourth time that you met with
23 your attorneys to prepare for your deposition?

24 A. Early April.

25 Q. Was that also a virtual meeting?

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1 A. Yes, it was.

2 Q. And approximately how long did that
3 meeting last?

4 A. About an hour and a half.

5 Q. When was the fifth time that you met with
6 your attorneys to prepare for your deposition?

7 A. In April.

8 Q. Do you recall when in April?

9 A. Yesterday.

10 Q. And was that an in-person meeting?

11 A. Yes, it was.

12 Q. Approximately how long did that meeting
13 last?

14 A. About three hours.

15 Q. And when was the sixth time that you met
16 with your attorneys to prepare for your deposition?

17 A. This morning.

18 Q. And was that in person?

19 A. Yes.

20 Q. And approximately how long did you meet
21 with your attorneys this morning to prepare for your
22 deposition?

23 A. About 30, 40 minutes.

24 Q. Other than the meetings that you've just
25 testified about, have you done anything else to

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1 prepare for your deposition?

2 A. No, I have not.

3 Q. Did you review any documents to prepare
4 for your deposition?

5 A. No, I have not.

6 Q. Did you bring any documents with you to
7 your deposition today?

8 A. No, I did not.

9 Q. Did you bring with -- any -- did you bring
10 any notes with you to your deposition today?

11 A. No, I did not.

12 Q. Did you meet with anybody other than your
13 attorneys to prepare for your deposition?

14 A. No, I did not.

15 Q. Have you discussed your deposition with
16 anybody other than your attorneys?

17 A. No, I have not.

18 Q. Have you discussed your deposition with
19 any other DeKalb County School District employees?

20 A. No, I have not.

21 Q. Have you reviewed any transcripts of any
22 depositions that have been taken in this case?

23 A. No, I have not.

24 Q. Have you spoken with any former or current
25 employees of the DeKalb County School District who

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1 have been deposed in this case about their
2 depositions?

3 A. No, I have not.

4 Q. You mentioned that Dr. Towns is your
5 direct supervisor?

6 A. Yes.

7 Q. Are you aware that Dr. Towns was deposed
8 in this case?

9 A. Yes.

10 Q. And during her deposition, Dr. Towns
11 testified that she met with you to prepare for her
12 deposition. Do you recall that meeting?

13 A. I provided data.

14 Q. Okay. Do you recall meeting with her to
15 prepare for her -- to prepare -- do you recall
16 meeting with her while she was preparing for her
17 deposition?

18 A. We didn't have a meeting about the
19 deposition.

20 Q. Okay. But you recall providing data to
21 her?

22 A. Yes.

23 Q. Do you recall what data you provided?

24 A. Social work referral data.

25 Q. Anything else?

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1 A. SAFE Center cost data.

2 Q. Okay. And do you recall providing any
3 other data to Dr. Towns in advance of her deposition?

4 A. No.

5 Q. I understand you didn't meet with
6 Dr. Towns as she was preparing for her deposition.
7 Did you have any conversations with Dr. Towns about
8 her deposition before she was deposed?

9 A. No, I did not.

10 Q. You mentioned providing social work
11 referral data and SAFE Center cost data to Dr. Towns.
12 Did you provide any other documents to her in advance
13 of her deposition?

14 A. Not that I can recall.

15 Q. Did Dr. Towns ask you any questions about
16 the documents -- about the data that you provided to
17 her in advance of her deposition?

18 A. No.

19 Q. And how did you provide that data?

20 A. Via e-mail.

21 Q. Do you have an understanding of what the
22 allegations in this lawsuit are?

23 A. Yes.

24 Q. And what is your understanding of what the
25 allegations are?

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1 A. That social media has had an adverse
2 impact on students, K through 12 students, that has
3 caused a great deal of hardship for the School
4 District, because it has caused us to have to
5 continually and repeatedly redirect students and take
6 away from instructional time. And it has caused an
7 increase in disciplinary concerns.

8 Q. Did you gain an understanding of the
9 allegations in this lawsuit from any source other
10 than conversations with your lawyers?

11 A. No, I did not.

12 Q. When did you first become aware of this
13 lawsuit?

14 A. In the summer of 2024.

15 Q. Did you gain an understanding of the fact
16 that DeKalb County School District was participating
17 in this lawsuit from any source other than
18 conversations with lawyers?

19 A. No, I did not.

20 Q. Were you involved with the decision made
21 by the DeKalb County School District to participate
22 in this lawsuit?

23 A. No, I was not.

24 Q. Do you know who was?

25 A. No, I don't.

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1 Q. Do you know when that decision was made?

2 A. I do not.

3 Q. Prior to the School District making the
4 decision to participate in this lawsuit, were you
5 involved with any -- were you involved in any
6 discussions about whether the School District should
7 participate in this lawsuit?

8 A. No.

9 Q. Do you know anybody who was involved in
10 those discussions?

11 A. No.

12 Q. Do you know -- well, that's fine.

13 Have you ever reviewed the complaint in
14 this litigation?

15 A. I have not.

16 Q. I'm going to show you a document that we
17 will mark as Exhibit 4, which is Tab 73.

18 (DeKalb-Revels Exhibit 4 was marked for
19 identification.)

20 BY MR. REINKE:

21 Q. If you could please take a moment to
22 review the document that I've marked as Exhibit 4,
23 and let me know when you've completed your review.

24 A. Okay.

25 Q. You've reviewed the document?

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1 A. I have.

2 Q. Have you seen this document before?

3 A. No, I have not.

4 Q. This document is titled "Plaintiff Fact
5 Sheet." Is that a term that you have heard before,
6 to your recollection?

7 A. No, I have not.

8 Q. Okay. If you flip to page 3 of this
9 document, under Section II, "Representative
10 Capacity," Question 7 says, "Name of individuals
11 completing this fact sheet." And you are listed as
12 one of the individuals. Is that correct?

13 A. Yes.

14 Q. Do you recall providing information to
15 your attorneys in connection with the Plaintiff fact
16 sheet?

17 A. Yes.

18 Q. Do you recall any specific information
19 that's reflected in this document that you personally
20 provided?

21 A. Page 27.

22 Q. Okay. And page 27: Are you referring to
23 the data in Question 38?

24 A. Yes.

25 Q. Okay. And Question 38 says, "Describe the

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1 portion of your student body receiving mental health
2 services in your district and how it has changed over
3 time since the 2017 through 2018 school year,
4 including approximate numbers and percentages if
5 available in any existing report, survey, analysis,
6 study or other document that provides an overview of
7 or describes student mental health services. Note:
8 This question is not designed to require review of
9 underlying individual student records."

10 Did I read that correctly?

11 A. Yes.

12 Q. And then there are numbers reflected for
13 school year 2018 through school year 2024 year to
14 date. Is that correct?

15 A. Yes.

16 Q. Did you provide the data that is listed
17 for each of those school years?

18 A. Yes.

19 Q. And how did you gather that data?

20 A. Through our student information system,
21 which is Infinite Campus.

22 Q. Did you gather this data by running a
23 search in Infinite Campus?

24 A. Yes, I did.

25 Q. And what do you recall searching for?

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1 A. Social work referrals.

2 Q. So is it your understanding that the data
3 reflected here reflects the total number of social
4 work referrals for the DeKalb County School District
5 for each of the school years that are listed?

6 A. In the category of mental health.

7 Q. Okay. So -- so you limited your search of
8 social work referrals to the category of mental
9 health?

10 A. Yes.

11 Q. Within Infinite Campus, social work
12 referrals are broken down into specific categories.
13 Correct?

14 A. Yes.

15 Q. And one of those categories is mental
16 health?

17 A. Yes.

18 Q. Okay. And so is it your understanding
19 that the data reflected in Question 38 of the
20 Plaintiff fact sheet is the number of social work
21 referrals for the category of mental health for the
22 DeKalb County School District for school years 2018
23 through 2024 year to date?

24 A. Yes.

25 Q. Underneath the data provided in

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1 Question 38, there's a paragraph. And that says,
2 "The decrease in students receiving services during
3 School Year '21 and School Year '22 could be
4 attributed to the District being on virtual learning
5 during COVID-19."

6 Did I read that first sentence correctly?

7 A. Yes.

8 Q. Did you personally draft that first
9 sentence?

10 A. No.

11 Q. Okay. Do you know who did?

12 A. No.

13 Q. Do you agree with that sentence?

14 A. Yes, I do.

15 Q. And is that consistent with your review of
16 the data that you collected for Question 38?

17 A. Yes.

18 Q. And the next sentence says: "The increase
19 during School Year '23 could be attributed to the use
20 of electronic technology as a major form of
21 communication by students through social media
22 platforms and less opportunity to communicate in
23 person while enhancing their social awareness skills,
24 self-awareness skills, responsible decision-making,
25 relationship building, and self-management."

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1 Did you personally draft that sentence?

2 A. No.

3 Q. Do you know who did?

4 A. No.

5 Q. Do you remember -- did you -- or do you
6 recall analyzing the social work referral data that
7 you pulled from Infinite Campus to determine why
8 there was an increase in the number of social work
9 referrals in the category of mental health from the
10 school year 2022 to the school year 2023?

11 MR. WALKER: Object to form.

12 THE WITNESS: Can you rephrase that?

13 BY MR. REINKE:

14 Q. Yeah. Did you analyze the data that you
15 pulled from Infinite Campus, that's reflected in the
16 answer to Question 38, to determine why there was an
17 increase in social work referrals for the category of
18 mental health from school year 2022 to school year
19 2023?

20 MR. WALKER: Object to form.

21 THE WITNESS: I didn't -- am I --

22 BY MR. REINKE:

23 Q. Yeah. The question is, did you analyze
24 it?

25 MR. WALKER: You can answer.

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1 THE WITNESS: Oh.

2 No.

3 BY MR. REINKE:

4 Q. Okay. So you -- you did not analyze the
5 data to determine why there was that increase?

6 A. No.

7 Q. Other than the data that we've looked at
8 in response to Question 38 of the Plaintiff fact
9 sheet, is there any other information that you recall
10 providing to your attorneys that's reflected in this
11 Plaintiff fact sheet?

12 A. On page 8.

13 Q. Okay.

14 A. Number 13.

15 Q. Okay. And -- and question -- just to be
16 clear, you recall providing the data that's reflected
17 in response to Question 13 to your attorneys in
18 connection with the completion of the Plaintiff fact
19 sheet?

20 A. The most recent -- the most recent years.
21 The most recent two years.

22 Q. Okay. So you recall providing the data
23 for the 2023 through 2024 school year and the 2022
24 through 2023 school year, correct?

25 A. Yes.

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1 Q. But you do not recall providing the data
2 in the answer to Question 13 for the earlier school
3 years; is that correct?

4 A. That's correct.

5 Q. Question 13 says, "Provide the total
6 number of on-campus health care workers (for example,
7 social workers, nurses, psychologists, psychiatrists,
8 counselors, et cetera) employed by the District from
9 2017 through 2018 to present or to the year for which
10 data is most currently available (specified as FTE if
11 available), as well as the total number of volunteers
12 in these positions, if any."

13 Did I read that correctly?

14 A. Yes.

15 Q. And -- and you provided the data for the
16 school year of 2023 through 2024 that reflects 554
17 on-campus health care workers during that school
18 year, correct?

19 A. Yes.

20 Q. Do you recall how you determined that
21 there were 554 on-campus health care workers for the
22 school year 2023 through 2024?

23 A. Yes.

24 Q. And how did you determine that?

25 A. I looked at records that I had and

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1 contacted HR.

2 Q. Okay. What records did you look at?

3 A. Records that reflected the names of
4 employees.

5 Q. And then you said you also contacted HR?

6 A. Yes.

7 Q. Do you recall who you contacted?

8 A. No.

9 Q. Do you recall what you asked HR?

10 A. Confirm the number of counselors.

11 Q. You mention the number of counselors.

12 Does this number, 554, reflect only the number of
13 counselors? Or does it reflect other positions
14 within the DeKalb County School District as well?

15 A. It reflects other positions as well.

16 Q. What is your understanding of the
17 positions that are counted in that number?

18 A. The social workers, nurses, psychologists,
19 and counselors.

20 Q. Does it include psychiatrists?

21 A. We do not have any psychiatrists.

22 Q. You also provided the data in response to
23 Question 13, stating that there were 512 on-campus
24 health care workers for the year 2022 through 2023,
25 correct?

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1 A. Yes.

2 Q. Do you recall how you determined that
3 number?

4 A. Yes.

5 Q. How did you determine that number?

6 A. I looked at the rosters of employees and
7 the positions.

8 Q. Were those like hard copy documents that
9 you had in your office?

10 A. Yes.

11 Q. Other than looking at those rosters, is
12 there anything else you did to determine that number?

13 A. I contacted HR as well.

14 Q. Was that just to verify that the data you
15 had was accurate?

16 A. Yes.

17 Q. And does that number, 512, also include
18 social workers, nurses, psychologists, and
19 counselors?

20 A. Yes.

21 Q. Does it include any other positions in
22 addition to those?

23 A. No.

24 Q. All right. Do you recall providing any
25 other data to your attorneys that is reflected within

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1 this Plaintiff fact sheet?

2 A. The information on page 10, Number 15.

3 Q. Okay. And page 10, Number 15, says,
4 "Other than health care workers identified above,
5 does the District have other employees who provide
6 mental health services? If yes, provide the total
7 number of such employees from 2017 through 2018 to
8 present or to the year for which data is most
9 currently available and their positions (specified as
10 FTE if available), as well as the total number of
11 volunteers in these positions, if any."

12 And then for the 2023 through 2024
13 school year, the response reflects that there were
14 9 employees. Correct?

15 A. Yes.

16 Q. Is that the data that you provided?

17 A. Yes.

18 Q. And do you recall where you got that data?

19 A. From notes that I had in my office.

20 Q. Was there any other source?

21 A. No.

22 Q. Did you verify that data with HR?

23 A. Yes.

24 Q. And then the column on the far right
25 indicates that the 9 employees consist of 3 mental

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1 health specialists and 6 mental health coordinators.

2 Correct?

3 A. Yes.

4 Q. Was that data that you also got from notes
5 in your office?

6 A. Yes.

7 Q. And did you also verify that data with HR?

8 A. Yes.

9 Q. What is a mental health specialist?

10 A. A mental health specialist is a
11 professional that provides services to students
12 within the school, direct services to students in the
13 school. It can be individual or group services
14 regarding mental health concerns.

15 Q. Okay. And -- and when you say "direct
16 services," what do you mean by that?

17 A. They may meet with the student directly.

18 Q. Like a counseling-type session?

19 A. A supportive therapeutic-type session.

20 Q. Do mental health specialists have any
21 other job responsibilities besides providing direct
22 services to students in schools?

23 A. No.

24 Q. And prior to the 2023 through 2024 school
25 year, did DeKalb County School District, to your

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1 knowledge, employee any mental health specialists?

2 A. No.

3 Q. For the 2024 through 2025 school year, so
4 the current school year, do you know if the DeKalb
5 County School District employs any mental health
6 specialists?

7 A. Yes, we do.

8 Q. And how many mental health specialists
9 does the DeKalb County School District employ for the
10 2024 through 2025 school year?

11 A. I do not know the exact number.

12 Q. Do you know if it's more than three?

13 A. Yes, it is.

14 Q. Do you know if it's more than ten?

15 A. No, it's not.

16 Q. Okay. The chart in the Plaintiff fact
17 sheet also refers to 6 mental health coordinators.
18 What is a mental health coordinator?

19 A. A mental health coordinator is a
20 professional that provides mental health support to a
21 specific area of schools. So they're assigned to
22 numerous schools.

23 Q. Is a mental health specialist assigned to
24 a particular school?

25 A. Yes.

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1 Q. Okay. And there are only three mental
2 health -- or at least at the time, 2023 through 2024
3 school year, there were only 3 mental health
4 specialists employed by the DeKalb County School
5 District, correct?

6 A. Yes.

7 Q. So were there only three schools where
8 mental health specialists provided services during
9 that school year?

10 A. Yes.

11 Q. Okay. And do you know what those three
12 schools were?

13 A. No.

14 Q. Do you know how those three schools were
15 chosen?

16 A. The principal was able to use their FTE.

17 Q. And when you say "able to use their FTE,"
18 what do you mean by that?

19 A. The principal had options of how to use
20 an FTE, and they could decide what they wanted to use
21 it for. And those principals opted to use it to hire
22 a mental health specialist.

23 Q. And "FTE" is full-time employee?

24 A. Full-time equivalent.

25 Q. Going back to the mental health

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1 coordinators: Mental health coordinators, you
2 testified, are assigned to a particular area, so they
3 support mental schools -- multiple schools, correct?

4 A. Yes.

5 Q. And in the 2023 through 2024 school year,
6 there were six mental health coordinators?

7 A. Yes.

8 Q. Do mental health coordinators provide
9 direct services to students?

10 A. Occasionally.

11 Q. And what would those direct -- direct
12 services include?

13 A. They can provide brief supportive
14 counseling, if there's an acute crisis.

15 Q. Do mental health coordinators have any job
16 responsibilities other than providing direct services
17 to students?

18 A. Yes.

19 Q. What are those job responsibilities?

20 A. They provide mental health-type trainings,
21 like mental health first-aid trainings, Connections
22 Matter trainings. So various types of trainings
23 related to mental health and wellness.

24 Q. Do you have an estimate of approximately
25 what percentage of their time a mental health

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1 coordinator would spend doing supportive counseling
2 to students versus the training function that you
3 described?

4 A. I do not. I do not supervise them.

5 Q. Who supervises them?

6 A. The area superintendent.

7 Q. And do you know who that is?

8 A. There are seven area superintendents.
9 They each are assigned to different area
10 superintendents.

11 Q. For the 2024 through 2025 school year,
12 does the DeKalb County School District employ any
13 mental health coordinators?

14 A. Yes.

15 Q. Do you know how many mental health
16 coordinators the DeKalb County School District
17 employs for the current school year?

18 A. Seven.

19 Q. Okay. Is there any other data that's
20 reflected in this Plaintiff fact sheet that you
21 provided?

22 A. Yes. On page 11, Number 16.

23 Q. Okay. And Question 16 says, "Provide the
24 total number of health care workers, (e.g., social
25 workers, nurses, psychologists, psychiatrists,

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1 counselors), employed by the District whose primary
2 responsibilities include addressing student mental
3 health issues from 2017 through 2018 to present or to
4 the year for which data is most currently available
5 and their positions (specified as FTE if available),
6 as well as the total number of volunteers in these
7 positions, if any."

8 Did I read that correctly?

9 A. Yes.

10 Q. And you -- did you provide the data for
11 all of the school years that are reflected in this
12 chart, or only some of the years?

13 A. Only some.

14 Q. And which years did you provide the data
15 for?

16 A. 2022-23 and '23-24.

17 Q. Okay. And this is the same data as the --
18 as the data that's reflected in response to
19 Question 13, correct?

20 A. It appears to be.

21 Q. Okay. Is there any other data reflected
22 in this Plaintiff fact sheet that you provided?

23 A. No.

24 Q. Other than providing the data that we've
25 discussed, did you assist with completing this

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1 Plaintiff fact sheet in any other way?

2 A. No.

3 Q. Okay. I want to draw your attention back
4 to page 3, Question 7: "Name of individuals
5 completing this fact sheet."

6 And we've already talked about Dr. Towns.
7 We talked about you. Larry Wright is also listed.
8 Do you know who Larry Wright is?

9 A. Yes.

10 Q. And what is his position?

11 A. He's a police officer with our Public
12 Safety Office.

13 Q. Okay. If you could, please, turn to
14 page 15.

15 And Question 21 on page 15 says: "To the
16 extent not listed above, identify the persons,
17 including their title/position, in your district most
18 knowledgeable about student mental health issues from
19 the 2017-2018 school year to the present."

20 You are identified under Question 21. Do
21 you see that?

22 A. Yes.

23 Q. Would you agree that you are the most
24 knowledgeable person in the District about student
25 mental health issues from the 2017 through 2018

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1 school year to the present?

2 A. Yes.

3 MR. WALKER: Object to form.

4 BY MR. REINKE:

5 Q. And then if we flip to the next page,
6 there's a heading at the top that's called "Damages."
7 You see that?

8 A. Yes.

9 Q. And Question 22 says, "State generally in
10 what way or how you claim you have been damaged by
11 each Defendant's alleged acts at issue in this
12 lawsuit and approximately when that injury began."

13 If you could please take a moment to read
14 the paragraphs listed under Question 22, and let me
15 know when you've completed that.

16 A. Okay.

17 Q. Did you write those paragraphs?

18 A. No, I do not -- I did not.

19 Q. Do you know who did?

20 A. No.

21 Q. Okay. And then if you could flip to
22 Question 23 on the next page.

23 It says, "Are you seeking monetary
24 damages?

25 "Choose your answer (Yes/No)."

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1 It says "Yes."

2 "If yes, identify each category of damages
3 or monetary relief that you allege."

4 Could you please take a moment to read
5 that paragraph, and tell me when you've completed
6 that.

7 A. Okay.

8 Q. Did you write that paragraph?

9 A. No.

10 Q. Do you know who did?

11 A. No.

12 Q. Okay. I want to draw your attention back
13 to the document we previously marked as Exhibit 2
14 which is your résumé.

15 Okay. And I want to start by talking
16 about your education. So that's listed on the third
17 page of your résumé.

18 So after high school, the first degree
19 that you obtained was a Bachelor of Arts; is that
20 correct?

21 A. Yes.

22 Q. You obtained that degree from Hampton
23 University?

24 A. Yes.

25 Q. And you studied sociology and criminal

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1 justice?

2 A. Yes.

3 Q. Do you recall when you obtained that
4 degree?

5 A. 1991.

6 Q. Okay. And then you obtained a master of
7 social work from New York University, studying
8 children and youth. Correct?

9 A. Yes.

10 Q. When did you obtain that degree?

11 A. 1993.

12 Q. Okay. And then you obtained a specialist
13 degree in educational leadership from the University
14 of Georgia in educational administration and policy,
15 correct?

16 A. Yes.

17 Q. When did you obtain that degree?

18 A. I recall 2013.

19 Q. Have you obtained any degrees after high
20 school that are not reflected on your résumé?

21 A. No.

22 Q. Now, turning to your work experience on
23 your résumé, looks like your first position listed is
24 a family service coordinator, from July of 1994
25 through August of 1995. Is that correct?

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1 A. Yes.

2 Q. And at that time, you were employed by the
3 Institute for Family Centered Services in Atlanta?

4 A. Yes.

5 Q. What is the Institute for Family Centered
6 Services?

7 A. It was a family preservation agency.

8 Q. Okay. And what is a family preservation
9 agency?

10 A. It's an agency that provides services in
11 order to maintain the integrity of a family, and
12 provide reunification services in case there was a
13 separation where a child was placed in foster care.

14 Q. And you were a family service coordinator
15 for that agency?

16 A. Yes.

17 Q. What were your job duties as a family
18 service coordinator?

19 A. To assess the needs of the family, provide
20 counseling and therapeutic-type services, supervise
21 visits, and provide recommendations to DFCS --

22 Q. And --

23 A. -- testify in court hearings, and serve as
24 part of a team.

25 Q. Thank you. And I didn't mean to cut you

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1 off; I thought you were finished.

2 You mentioned "DFCS." What is that?

3 A. The Department of Family and Children
4 Services.

5 Q. Is that a State of Georgia agency?

6 A. Yes, it is.

7 Q. After -- well, when you were a family
8 service coordinator, you did not work in a school,
9 correct?

10 A. That's correct.

11 Q. Okay. And then after you were a family
12 service coordinator, you became employed as a school
13 social worker for Atlanta Public Schools?

14 A. Yes.

15 Q. And you began in that position in August
16 of 1995, correct?

17 A. Yes.

18 Q. Was this the first position that you held
19 in a school or school district?

20 A. Yes, it was.

21 Q. Okay. And you held that position from
22 August 1995 through June of 2009?

23 A. Yes.

24 Q. What were your job duties as a school
25 social worker for Atlanta Public Schools?

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1 A. To respond to child welfare concerns, and
2 to respond to referrals. To provide supportive
3 counseling to students that exhibited mental health
4 concerns, including suicidal ideation, self-esteem
5 concerns, poor conflict resolution skills, anxiety,
6 depression, any school phobia -- any issues that
7 students presented with while at school that had an
8 adverse impact on their academic success.

9 I was responsible for leading committees
10 and teams while I was there. I was also responsible
11 for taking truancy cases to court, filing the
12 complaints, responsible doing trainings around child
13 abuse and neglect. And like I said, anything to do
14 with child welfare; so developing safety plans,
15 initiating projects, meeting with students
16 individually, meeting with their families, conducting
17 home visits, participating in multidisciplinary team
18 meetings.

19 Q. You mentioned responding to child welfare
20 concerns as one your job duties. When you say "child
21 welfare concerns," what do you mean by that?

22 A. Typically child welfare concerns are
23 concerns that students may have around safety issues
24 presented to them, either at home or at school; cases
25 regarding maltreatment by an adult or another family

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1 member.

2 Q. Okay. And you said that your job duties
3 included responding to these concerns. What do you
4 mean by "responding"?

5 A. Interviewing. Meeting with students
6 individually. Meeting with their siblings
7 individually. Meeting with the -- the maltreater in
8 certain instances. And calling, making reports to
9 DFCS where needed. Making -- or filing complaints
10 with juvenile court as needed.

11 Q. When you refer to like "maltreatment" or
12 "maltreater," are you referring to child abuse?

13 A. I am.

14 Q. You also mentioned that part of your role
15 as a school social worker for the Atlanta Public
16 Schools was providing supportive counseling. How did
17 you do that?

18 A. I did that in one-on-one sessions, and
19 hosting groups for students that may have been
20 grieving the loss of a family member, or students
21 that may have had some conflict resolution
22 skill-building needs, poor self-esteem. So just
23 facilitating direct services-type interactions with
24 students.

25 Q. And obviously you had a number of duties

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1 when you were a school social worker. Can you
2 estimate approximately what percentage of your time
3 you spent doing this supportive counseling that you
4 describe?

5 A. 80 percent.

6 Q. And of that 80 percent of your time, that
7 was split between like one-on-one sessions and group
8 sessions; is that right?

9 A. Right, meeting the students individually,
10 yeah.

11 Q. Right. What -- what percentage of your
12 time would you estimate was spent meeting with
13 students individually?

14 A. About 70 percent of that.

15 Q. Okay. And what percentage of your time
16 was spent meeting with students in groups?

17 A. 10 percent.

18 Q. Okay. On your résumé, the fifth bullet
19 point down indicates that you completed psychosocial
20 assessments as a school social worker. What is a
21 psychosocial assessment?

22 A. A psychosocial assessment looks at all the
23 surrounding factors that have an impact on a child's
24 life. And so we look at family, look at the
25 community. We look at school, at medical concerns.

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1 If religion plays a role.

2 Anything that plays a role in the
3 development of that child and that family that can
4 possibly have an impact on their performance.

5 Q. For what purpose are these psychosocial
6 assessments conducted?

7 A. They were conducted as part of what was
8 then called the SST process, the student support team
9 process. They were conducted as part of that process
10 when a child was referred to the SST process, and if
11 they needed further evaluation because there was a
12 suspected disability.

13 Q. Okay. So were these assessments conducted
14 in determining whether a student needed like an IEP
15 or a Section 504 plan?

16 A. No, they -- well, they were conducted
17 to assist the psychologist in their testing to
18 determine if a child had a disability that would
19 warrant an IEP.

20 Q. Okay. Were they conducted for any other
21 purpose that you can recall?

22 A. No, they were not.

23 Q. And then it looks like in July of 2009,
24 you became coordinator for social work services for
25 Atlanta Public Schools, correct?

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1 A. Yes.

2 Q. Was that a promotion from your role as
3 school social worker?

4 A. Yes, it was.

5 Q. And you served in the position of
6 coordinator for social work services for Atlanta
7 Public Schools from July 2009 through June of 2016,
8 correct?

9 A. Yes.

10 Q. What were your job duties as coordinator
11 of social work services for Atlanta Public Schools?

12 A. I provided leadership to the school social
13 work department. I was responsible for personnel
14 matters, for hiring social workers, and providing
15 support and guidance, direction to them. To provide
16 training to social workers. I served as the -- the
17 LGBT liaison for the District. And I served on
18 multidisciplinary teams. I developed a sexual
19 assault prevention task force while I was there. I
20 led the District attendance plan while I was there.
21 I became the trained deescalation facilitator while I
22 was there. I managed budgets. I prepared State
23 reports for the Georgia Department of Education. I
24 also provided leadership to the homeless education
25 program, worked with the migrant program, the truancy

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1 prevention program. I met with external and internal
2 community partners to develop programming for the
3 District, and managed budgets.

4 Q. You mentioned developing programming for
5 the District. What kind of programming did you
6 develop?

7 A. Programming around supporting students.
8 And so like pregnancy prevention programming,
9 programming around sexual assault, the prevention of
10 sexual assault. Increase awareness around child
11 abuse, particularly child sexual abuse. Increase
12 awareness around suicide prevention.

13 Q. Do you recall if you developed any
14 programming that was specifically focused on social
15 media?

16 A. Social media presented itself as a concern
17 back when I was in Atlanta Public Schools. And there
18 was -- there was several concerns that came up around
19 social media at the time, so we were able to address
20 that through our trainings around suicide prevention,
21 around safety. So we were able to -- to discuss that
22 during that time.

23 Q. Okay. You mentioned that there was
24 several concerns around social media at this time,
25 when you were at Atlanta Public Schools. What were

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1 those concerns?

2 A. We started noticing that students were
3 distracted in class. We started noticing that it was
4 difficult to redirect students when they needed to be
5 redirected. And we started noticing that we had an
6 increase in behavioral concerns.

7 Q. And did you develop programming that
8 specifically addressed these concerns?

9 A. We included the discussion around taking
10 precautions to prevent further problems. And so we
11 incorporated that into trainings that we were doing.

12 Q. Which trainings was that incorporated
13 into?

14 A. Our suicide prevention training.

15 Q. Any other trainings that you can recall?

16 A. Our mental health first-aid training.

17 Q. Anything else that you recall?

18 A. No.

19 Q. You said you incorporated things about
20 taking precautions into those trainings. Do you
21 recall specific precautions that you trained people
22 on?

23 A. Limiting time that was spent on social
24 media.

25 Q. Any -- sorry. Any others?

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1 A. And just around not engaging in social
2 media to the point where it becomes a distraction
3 from the core work, which for us is teaching children
4 and increasing their academic capability.

5 Q. Do you recall any other precautions that
6 you included in these trainings?

7 A. Not during that time.

8 Q. Okay. In your role as coordinator for
9 social work services for Atlanta Public Schools,
10 during the time you held that position, did you
11 personally complete psychosocial assessments of
12 students?

13 A. As the coordinator, I don't recall
14 completing them. I recall reviewing.

15 Q. In your role as coordinator, so just
16 during the time period you held that position, did
17 you personally provide supportive counseling to
18 students in Atlanta Public Schools?

19 A. Yes, I did.

20 Q. Okay. And approximately how much -- what
21 percentage of your time in your role as coordinator
22 did you spend providing supportive counseling to
23 students?

24 A. About -- about 25 percent of the time.

25 Q. And did that include both one-on-one

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1 sessions and groups?

2 A. It did.

3 MR. REINKE: We've been going for about an
4 hour, so let's take a break and go off the
5 record.

6 VIDEOGRAPHER: We're going off --
7 (Interruption.)

8 VIDEOGRAPHER: We're going off the record
9 at 10:15.

10 (A recess transpired from 10:15 a.m. until
11 10:32 a.m.)

12 VIDEOGRAPHER: We're back on the record
13 at 10:32.

14 BY MR. REINKE:

15 Q. All right. Ms. Revels, before the break
16 we were discussing your employment with Atlanta
17 Public Schools. You left Atlanta Public Schools in
18 June of 2016, correct?

19 A. Yes.

20 Q. And then you became employed by DeKalb
21 County School District in July of 2016?

22 A. Yes.

23 Q. And at that time that you first became
24 employed by the DeKalb County School District, your
25 title was lead of social work services?

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1 A. Yes.

2 Q. What was your job function when you were
3 lead of social work services for the DeKalb County
4 School District?

5 A. I worked directly under the coordinator of
6 social work services, and so I provided support to
7 the social work department under the guidance of the
8 coordinator.

9 Q. During your time as lead of social work
10 services for the DeKalb County School District, did
11 you conduct any psychosocial assessments of DeKalb
12 County School District students?

13 A. No, I did not.

14 Q. And during your time as lead of social
15 work services for the DeKalb County School District,
16 did you conduct any supportive counseling for DeKalb
17 County School District students?

18 A. Yes, I did.

19 Q. And about what percentage of your time,
20 when you were lead of social work services for the
21 DeKalb County School District, would you estimate
22 that you spent conducting supportive counseling for
23 DeKalb County School District students?

24 A. About 15 percent.

25 Q. You served as lead of social work services

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1 for the DeKalb County School District from July of
2 2016 through July of 2017, correct?

3 A. Yes.

4 Q. And then in July of 2017, your title
5 changed to coordinator of social work services?

6 A. Yes.

7 Q. Did your job duties also change?

8 A. Yes.

9 Q. How so?

10 A. In addition to what is listed below, I had
11 the additional responsibility for corrective actions
12 if a social worker did something that was against
13 school policy.

14 Q. Okay. Were there any other ways in which
15 your job changed when you became coordinator of
16 social work services?

17 A. I completed evaluations.

18 Q. Evaluations of social workers?

19 A. Yes.

20 Q. Any additional duties when you became
21 coordinator of social work services?

22 A. No more additional duties.

23 Q. You mentioned that when you became
24 coordinator of social work services, you gained
25 responsibility for corrective actions. Would that be

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1 corrective actions for social workers who violated
2 some sort of policy or, you know, did some other
3 wrong?

4 A. Yes.

5 Q. Okay. So that wasn't like corrective
6 actions for students?

7 A. No.

8 Q. Okay. As coordinator of social work
9 services for the DeKalb County School District, did
10 you complete psychosocial assessments for DeKalb
11 County School District students?

12 A. No.

13 Q. And as coordinator of social work services
14 for the DeKalb County School District, did you do any
15 supportive counseling for DeKalb County School
16 District students?

17 A. Yes.

18 Q. And about what time -- what percentage of
19 your time as coordinator of social work services for
20 the DeKalb County School District would you estimate
21 that you spent providing supportive counseling for
22 DeKalb County School District students?

23 A. About -- about 20 percent.

24 Q. And if you could just briefly describe for
25 me the type of supportive counseling you did for

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1 DeKalb County School District students in that role.

2 A. I lead the District crisis team. And so
3 when there's a death of a student or a staff member,
4 I have to gather the team together and go out to the
5 school to provide supportive counseling to students.

6 Q. Okay. Other than providing supportive
7 counseling to students during times related to the
8 death of a student or a staff member, were there any
9 other circumstances in which you provided supportive
10 counseling to DeKalb County School District students
11 during your time as coordinator of social work
12 services?

13 A. Yes. When there is an allegation against
14 employee wrongdoing involving a student.

15 Q. When there was an allegation of an
16 employee wrongdoing involving a student, what would
17 your role be?

18 A. To interview the student and get a
19 statement.

20 Q. Any -- anything else?

21 A. And to provide that emotional support
22 during the interviews.

23 Q. Other than in your function leading the
24 District crisis team associated with deaths of
25 students or staff members, and what you just

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1 described with respect to allegations of employee
2 wrongdoing involving students, did you -- were there
3 any other circumstances in which you provided
4 supportive counseling to DeKalb County School
5 District students during the time you were
6 coordinator of social work services?

7 A. There may have been instances where I
8 provided supportive counseling when an employee was
9 absent, so if a social worker was out and I needed to
10 go to the school to provide support to a student.

11 Q. Do you have any specific recollection of
12 doing that when you were coordinator?

13 A. A couple times.

14 Q. A couple times during the five- or
15 six-year period you served in that role?

16 A. Yes.

17 Q. Okay. Other than what we've just been
18 discussing, can you recall any other circumstances in
19 which you provided supportive counseling to DeKalb
20 County School District students during the time you
21 were coordinator of social work services?

22 A. No.

23 Q. When you were in the role of coordinator
24 of social work services, is it fair to say that you
25 led the social work department for DeKalb County

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1 School District?

2 A. I did.

3 Q. Okay. And who did you report to in that
4 role?

5 A. The deputy superintendent, Deborah
6 Moore-Sanders.

7 Q. Did you have any direct reports in that
8 role?

9 A. I did.

10 Q. How many direct reports did you have?

11 A. Approximately 40.

12 Q. Would that include the social workers that
13 were employed by the DeKalb County School District at
14 the time?

15 A. Yes.

16 Q. Other than social workers, were there any
17 other positions that directly reported to you when
18 you were coordinator of social work services?

19 A. Secretarial-type positions.

20 Q. Okay. Anything other than that?

21 A. The migrant education program tutor.

22 Q. What is the migrant education program?

23 A. That's the program that serves families
24 that have been identified as migratory.

25 Q. Other than what we've just discussed, did

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1 you have any other direct reports when you were
2 coordinator of social work services?

3 A. No.

4 Q. I want to talk to you about a couple of
5 bullet points on your résumé. The fifth one down
6 says "Enhanced technology practices, including child
7 abuse, homeless and annual data to ensure accuracy."

8 What do you mean by "enhanced technology
9 practices"?

10 A. We were changing over -- we had just
11 changed over to using Infinite Campus to house social
12 work records at the time. And so I met with the
13 vendor to streamline the process and make it more
14 intuitive to the staff, so that they were not having
15 difficulty with inputting data.

16 Q. You mentioned that DeKalb County School
17 District had just transitioned to using Infinite
18 Campus to track social work records. Do you recall
19 when DeKalb County School District started using
20 Infinite Campus for that purpose?

21 A. The 2016 school year, they started using
22 Infinite Campus.

23 Q. And do you know what system they had been
24 using to track social work records before Infinite
25 Campus?

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1 A. I just started my employment with them in
2 2016.

3 Q. All right. So you don't know?

4 A. No.

5 Q. Other than assisting with the transition
6 to Infinite Campus in the way that you described, was
7 there anything else that you did to enhance
8 technology practices in your role as lead of social
9 work services or coordinator of social work services?

10 A. We created a uniform presentation to
11 conduct our mandated reporter training for staff
12 members.

13 Q. What is mandated reporter training?

14 A. There's an annual training that's mandated
15 regarding child abuse. And so we had to create a
16 training for staff members so they would know how to
17 recognize signs of abuse and the proper way to make a
18 report.

19 Q. Was this training like a PowerPoint
20 presentation?

21 A. Yes.

22 Q. Was it presented to staff members like in
23 an in-person presentation?

24 A. Yes.

25 Q. Other than the PowerPoint presentation,

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1 did you use any other technology in connection with
2 that training?

3 A. No.

4 Q. The next bullet point on your résumé says,
5 "Redesigned annual social work presentation to more
6 effectively reflect roles and responsibilities."

7 What is the annual social work
8 presentation?

9 A. That's the comprehensive presentation that
10 we provide to staff members. And so it includes the
11 child abuse, homelessness, suicidal ideation; various
12 areas.

13 Q. And you redesigned that presentation in
14 your role as either lead of social work services or
15 coordinator of social work services?

16 A. Yes.

17 Q. Do you recall which title you held when
18 you redesigned that presentation?

19 A. Lead.

20 Q. So this would have been in the time frame
21 of July 2016 through July 2017 that you redesigned
22 that presentation?

23 A. Yes.

24 Q. How did you redesign the presentation?

25 A. We expanded it to become a more

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1 comprehensive presentation.

2 Q. Were there particular topics within this
3 presentation that were not previously included, that
4 you added?

5 A. Yes.

6 Q. Do you recall what any of those topics
7 were?

8 A. We added attendance. We added migrant,
9 foster care, suicidal ideation, volunteers.

10 Q. Before you redesigned the presentation, to
11 your recollection, did it include any content related
12 to social media?

13 MR. WALKER: Object to form.

14 THE WITNESS: Not that I recall.

15 BY MR. REINKE:

16 Q. Did you add any content related to social
17 media when you redesigned the presentation?

18 A. We added social media in the human
19 trafficking portion.

20 Q. What do you recall about that?

21 A. We wanted staff members to be aware of
22 students using social media during the school day.

23 Q. Okay. And was that specifically in
24 connection with the human trafficking portion of the
25 presentation?

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1 A. Yes.

2 Q. Do you recall what you added about social
3 media to the human traffic portion of the
4 presentation?

5 A. Not exactly.

6 Q. You testified that you wanted staff
7 members to be aware of students using social media
8 during the school day. Why did you want staff
9 members to be aware of that?

10 A. In regards to human trafficking, we
11 learned that students are sometimes being adversely
12 impacted by social media during the school day.

13 Q. In regards to human trafficking?

14 A. Yes.

15 Q. And how are students being adversely
16 impacted by social media during the school day in
17 regards to human trafficking?

18 A. They're being distracted by -- by
19 predators. And so we just wanted teachers to be
20 aware, and to remind students not to get on their
21 devices during the school day.

22 Q. You testified that this was something you
23 learned. Do you recall where you learned this?

24 A. Through trainings.

25 Q. Do you recall any specific trainings?

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1 A. There was a training that was provided by
2 the district attorney of DeKalb County.

3 Q. Do you recall who that was at the time?

4 A. I do not.

5 Q. Were there any other trainings where you
6 learned that?

7 A. Not that I can recall.

8 Q. Okay. Other than the social media content
9 related to human trafficking that you added to the
10 presentation, do you recall adding any other content
11 to this annual social work presentation related to
12 social media?

13 A. No, I do not.

14 Q. Now, in September 2022, you became
15 director of Wrap Around and Student Support for
16 DeKalb County School District?

17 A. Yes.

18 Q. On your résumé, your position, coordinator
19 of social work services, says July 2017 through 2022.
20 Did you hold that position up until the time you
21 became director of Wrap Around and Student Support?

22 A. Yes.

23 Q. Okay. So you were continuously employed
24 by -- you've been continuously employed by the DeKalb
25 County School District from, I guess, the time you

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1 started in July of 2016 through the present. Is that
2 correct?

3 A. Yes.

4 Q. Okay. What are your job duties as the
5 director of Wrap Around and Student Support for the
6 DeKalb County School District?

7 A. I provide leadership to four departments.
8 I coordinate resources, both internal and external
9 resources, to support students. I develop SAFE
10 Centers. I provide brief supportive counseling to
11 students that are having acute crisis in regards to
12 death. I manage budgets, both the general and
13 federal budgets. Responsible for hiring and
14 evaluating and developing employees, and developing
15 processes and procedures and guidelines in regards to
16 District policy and procedures, and represent the
17 department with internal and external stakeholders.

18 Q. And that department is called Wrap Around
19 and Student Support?

20 A. Yes.

21 Q. What -- what does the term "Wrap Around"
22 mean?

23 A. It means that we are providing
24 comprehensive services to students to remove barriers
25 to them receiving instruction.

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1 Q. So you mentioned comprehensive services.
2 What are some of the services that you provide?

3 A. We provide mental health services,
4 therapeutic-type services, social-emotional services,
5 tangible services such as food pantries and clothing
6 closets.

7 So it's a variety of services that are
8 nonacademic to support students while they're in
9 school.

10 Q. You testified that you provide
11 comprehensive services to students to remove barriers
12 to them receiving instruction. Are there particular
13 barriers to students receiving instruction that your
14 department tries to address?

15 A. Yes.

16 Q. And what are those?

17 A. Attendance. Discipline. Mental health.
18 And family barriers that may present themselves,
19 child welfare issues. Homelessness. Foster care.
20 Migrant. And a host of other issues that -- I can't
21 think of every single issue at this moment.

22 Q. These are issues like from outside of
23 school that could affect students' performance in
24 school?

25 MR. WALKER: Object to form.

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1 THE WITNESS: They're issues both inside
2 of school that have impact on students, and
3 outside of school.

4 BY MR. REINKE:

5 Q. You testified that in your role as
6 director of Wrap Around and Student Support, you
7 provide leadership to four departments. Are those
8 the four departments that are listed on your résumé?

9 A. Yes.

10 Q. Okay. So "after school": What is that
11 department?

12 A. It's the after-school program that
13 students participate in after the traditional school
14 day has ended.

15 Q. And -- and what is the purpose of that
16 program?

17 A. It's to provide supervision for students
18 after school. And then they have different programs
19 in the -- in that program. So they may have
20 recreational component to it and an academic
21 component.

22 Q. You also provide leadership to the nursing
23 department?

24 A. Yes.

25 Q. What is the nursing department?

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1 A. The nursing department is comprised of
2 nurses that provide medical support to students in
3 the schools.

4 Q. And what type of medical support do nurses
5 provide to students in schools?

6 A. If a student has a medical diagnosis, the
7 nurse treats that child based on their diagnosis and
8 doctor's orders.

9 Q. Is there any other type of medical support
10 that nurses provide?

11 A. They provide any type of acute support
12 that may come up unexpectedly, if there's an
13 unexpected accident at school or emergency at school.

14 Q. Do nurses provide mental health support to
15 students in the DeKalb County School District?

16 A. If a student comes to them with an acute
17 need, they can provide that supportive counseling to
18 them.

19 Q. Okay. But other than in that context,
20 then no?

21 A. They are not hired to provide mental
22 health support. They are hired to provide medical.

23 Q. You also provide leadership to the
24 Title IV department.

25 A. Right.

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1 Q. What is the Title IV department?

2 A. Title IV is a federally funded program
3 that makes provisions to provide supportive services
4 to students in regards to student safety, technology,
5 and their wellness.

6 Q. So you mentioned supportive services in
7 regards to student safety, technology, and wellness.
8 I want to focus first on student safety.

9 What types of supportive services does
10 Title IV provide to DeKalb County School District
11 students with regard to their safety?

12 A. They -- Title IV funding, they have
13 purchased equipment for the Public Safety Office,
14 surveillance-type equipment for the Public Safety
15 Office, to help during large events, like athletic
16 events. And then they provide support to -- to the
17 schools and to the students by having trainings, such
18 as restorative practice trainings, mental
19 health/first-aid trainings.

20 Q. Do you know if any of these trainings are
21 specifically focused on social media?

22 A. Social media comes up during the
23 trainings. And so as part of the mental health
24 first-aid training, social media does come up in
25 there, just as a precaution. Because we're talking

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1 about mental health and wellness, and how to preserve
2 mental health and wellness.

3 Q. Okay. So you mentioned that that -- that
4 social media comes up in the mental health first-aid
5 training. Are you aware of any other restorative
6 practices training where the -- where social media
7 comes up?

8 A. I can't recall, because I have not been in
9 one of those trainings recently.

10 Q. What is the mental health first-aid
11 training?

12 A. The mental health first-aid training is a
13 six- or seven-hour training that certain staff
14 members in the District have been trained to
15 facilitate. And it takes a look at common illnesses
16 that students are dealing with, mental health
17 concerns that students are dealing with. And it
18 tells staff how to identify those symptoms and how to
19 seek help.

20 Q. And who gives this training?

21 A. We have staff members within the District
22 that have been trained to redeliver the training.

23 Q. Staff members like within your department?

24 A. It's a mixture of staff members.

25 Q. Do you know any of -- who any of the staff

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1 members that give this training are?

2 A. Yes.

3 Q. And who are they?

4 A. Some of them are social workers, school
5 social workers. And some are mental health
6 coordinators.

7 Q. And who is this training given to?

8 A. Staff members.

9 Q. Is it given to all staff members in the
10 DeKalb County School District?

11 A. That is the intention, and so we are
12 signing up staff members throughout the school year.

13 Q. Okay. Do you know like what percentage of
14 current DeKalb County School District staff members
15 have received this training?

16 A. I don't.

17 Q. When was this mental health first-aid
18 training first given within the DeKalb County School
19 District?

20 A. I don't recall the exact year. Maybe
21 around 2017.

22 Q. Okay. You mentioned that the intention
23 was to give the training to all staff members, and
24 you said give the training to all staff members. Do
25 you mean that the intention is that each staff member

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1 would sit through this training once?

2 A. Yes.

3 Q. Okay. So it's not something -- the
4 intention is not that this training would be given to
5 every staff member annually, correct?

6 A. That's correct.

7 Q. You said that this is a six- to seven-hour
8 training that looks at common illnesses. What are
9 some of the illnesses that are covered in this
10 training?

11 A. Attention deficit hyperactivity disorder.
12 Substance abuse disorder. Depression. Suicidal
13 ideation.

14 I can't recall all the other . . .

15 Q. You also testified that social media comes
16 up in this training. How does social media come up
17 in this training?

18 A. It comes up when we are talking about
19 possible addictive behavior.

20 Q. Okay. And so social media is mentioned as
21 a possible addictive behavior in the training?

22 A. The presenter brings it up, yes.

23 Q. Okay. Is there any other way in which
24 social media comes up?

25 A. Not that I can think of.

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1 Q. Now, going back to the Title IV department
2 within your leadership, you mentioned that in
3 addition to the supportive services for safety, the
4 Title IV department provides supportive services for
5 technology. What kind of supportive services for
6 technology does the Title IV department provide?

7 A. Purchasing devices. Purchasing laptops
8 and printers. Computers.

9 Q. Okay. And -- and who are these devices
10 purchased for?

11 A. We have student engagement coaches.

12 Q. What is a student engagement coach?

13 A. They are employees that work with a cohort
14 of 40 students in order to provide mentoring services
15 to increase their academic performance.

16 Q. Is this like part of a program or
17 initiative within the District?

18 A. It's a program in the District.

19 Q. Does that program have name?

20 A. The Check & Connect program.

21 Q. And what is the Check & Connect program?

22 A. It's a program where we identify
23 40 students in a school, that those students are
24 typically presenting with academic or behavioral or
25 attendance concerns. And we pair them with the

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1 student engagement coach in order to decrease
2 behavioral concerns, increase attendance, and
3 increase academic performance.

4 Q. Is this program specific to students who
5 have concerns related to social media?

6 MR. WALKER: Object to form.

7 THE WITNESS: The program is specific to
8 students that we see have some academic
9 concerns.

10 BY MR. REINKE:

11 Q. Okay. So -- so they may have academic
12 concerns for reasons other than social media,
13 correct?

14 MR. WALKER: Object to form.

15 THE WITNESS: They have academic concerns
16 for a multitude of reasons.

17 BY MR. REINKE:

18 Q. Right. So I guess what I'm trying to get
19 at is in order for a student to participate in the
20 Check & Connect program, there doesn't have to be a
21 determination made that that student's concerns are
22 related to social media, right?

23 A. The student may have concerns related to
24 social media, thus having an adverse impact on their
25 academic performance.

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1 Q. Right. I understand that they might. But
2 a student could also participate in the Check &
3 Connect program if they had concerns -- academic
4 concerns, or discipline concerns, or behavioral
5 concerns -- that were unrelated to social media,
6 correct?

7 MR. WALKER: Object to form.

8 THE WITNESS: Students can participate in
9 the program whether or not they have concerns
10 related to academic, attendance, behavior.

11 BY MR. REINKE:

12 Q. Right. And whether or not those concerns
13 are related to social media?

14 A. Some of those concerns are related, and
15 some may not be related, so they can participate in
16 the program.

17 Q. Either way, right?

18 MR. WALKER: Object to form.

19 BY MR. REINKE:

20 Q. Yes?

21 A. They can participate in the program
22 whether they have concerns or not.

23 Q. Okay.

24 So you mentioned purchasing devices to
25 support this -- the student engagement coaches and

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1 the Check & Connect program. Is there other -- are
2 there any other types of technology-supportive
3 services that the Title IV department provides?

4 A. We purchase software to track student
5 behavior.

6 Q. Okay. And what software is that?

7 A. I cannot recall the exact title of the
8 software.

9 Q. Is this something that's separate from
10 like disciplinary incidents that are tracked in
11 Infinite Campus?

12 A. It is another platform, that we track
13 concerns.

14 Q. And how -- how are -- how is student
15 behavior tracked in this platform?

16 A. I am not intimately familiar with exactly
17 how it's tracked.

18 Q. Okay. Do you have a general understanding
19 of how it's tracked?

20 A. Student behavior is notated in there so we
21 can run reports.

22 Q. What type of behavior?

23 A. Like I said, I'm not intimately involved
24 in maintaining any data on that platform myself, so
25 I'm not sure exactly what is inputted in that

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1 platform.

2 Q. Are you aware of whether this platform
3 contains any data related to behavioral incidents
4 that are attributed to social media?

5 MR. WALKER: Objection to form.

6 THE WITNESS: I'm not aware.

7 BY MR. REINKE:

8 Q. And if you know, when did the DeKalb
9 County School District start using this platform?

10 A. Prior to my employment with the District.

11 Q. Okay. So prior to July of 2016.

12 Does this platform, to your knowledge,
13 track behavioral incidents across the District as a
14 whole?

15 A. No, it doesn't. Only tracks behavior that
16 the student engagement coaches enters in there for
17 the schools that they're assigned to.

18 Q. Okay. And how many student engagement
19 coaches does the DeKalb County School District
20 currently employ?

21 A. Approximately 27.

22 Q. Are there any other ways in which the
23 Title IV department provides supportive services in
24 relation to technology?

25 A. Not that I can recollect.

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1 Q. You also testified that the Title IV
2 department provides supportive services in relation
3 to wellness. How does the Title IV -- or what type
4 of services does the Title IV department provide in
5 relation to wellness?

6 A. They pay for the employment of PBIS
7 coaches. And they also pay for the Big Brothers/Big
8 Sisters partnership at one of our middle schools, at
9 Lithonia Middle School. And they pay for a
10 prevention/intervention liaison at the DeKalb
11 Alternative School.

12 Q. Okay. Any other supportive services with
13 respect to wellness that the Title IV department
14 provides?

15 A. Not that I can recollect.

16 Q. You mentioned PBIS coaches. What is a
17 PBIS coach?

18 A. "PBIS" is an acronym for positive behavior
19 intervention and support. And they provide guidance
20 to schools who are wanting to become PBIS schools.
21 Those schools are implementing that program to try to
22 decrease behavioral concerns and increase academic
23 performance.

24 Q. Okay. So some schools within the DeKalb
25 County School District have implemented PBIS program,

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1 and others have not?

2 A. Yes.

3 Q. Do you know approximately what percentage
4 of DeKalb County schools have implemented a PBIS
5 program?

6 A. I don't.

7 Q. Do you know how many PBIS coaches the
8 DeKalb County School District currently employs?

9 A. Approximately seven at the District level.

10 Q. And what is the general job description
11 for a PBIS coach?

12 A. To manage the rollout of the PBIS
13 training, and -- and work in the schools. And so
14 they go out to schools to train School District staff
15 on how to effectively implement the PBIS model.

16 Q. You also mentioned the Big Brothers and
17 Big Sisters partnership. What is that?

18 A. The Big Brothers/Big Sisters program is a
19 mentoring program through the Big Brothers/Big
20 Sisters of Atlanta. And they provide three staff
21 members to Lithonia Middle School, and they meet with
22 200 students throughout the school year to provide
23 mentoring services.

24 Q. What is the purpose of this program?

25 A. To increase academic performance.

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1 Q. What types of mentoring services do -- are
2 provided through this program?

3 A. It's primarily character-building-type
4 services, social-emotional-type services.

5 Q. Do you know if any of these services that
6 are provided through this program are specifically
7 related to social media?

8 A. I don't know if any of those services are
9 related.

10 Q. You also mentioned a
11 prevention/intervention liaison?

12 A. Yes.

13 Q. What is that?

14 A. She provides support to students at the
15 DeKalb Alternative School.

16 Q. So this is just a single employee that has
17 that position?

18 A. Yes.

19 Q. What is the DeKalb Alternative School?

20 A. It's a school where students that have
21 disciplinary concerns that are pervasive are assigned
22 to, as a result of a student hearing.

23 Q. You said that the prevention/intervention
24 liaison provides support to students at that school.
25 What type of support?

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1 A. She meets with students at that school
2 individually, if they're having some concerns, or
3 they need to talk to someone about.

4 Q. Is the prevention/intervention liaison a
5 licensed social worker?

6 A. No, she's not.

7 Q. Is she like a licensed school
8 psychologist?

9 A. No, she's not.

10 Q. Licensed counselor?

11 A. Yes, she is.

12 Q. Other than the DeKalb Alternative School,
13 do any schools within the DeKalb County School
14 District have a prevention/intervention liaison?

15 A. No, they do not.

16 Q. One of the departments that you provide
17 leadership to is the Social Work Department, correct?

18 A. Yes.

19 Q. And what is the social work department?

20 A. The social work department is a department
21 that provides support in regards to child welfare
22 concerns that are presented by students.

23 Q. Okay. And when you say that the
24 department provides support, what type of support
25 does the department provide?

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1 A. They respond to referrals that are related
2 to child abuse and neglect. Mental health concerns,
3 truancy concerns, family concerns, homelessness,
4 poverty.

5 Q. The third bullet point on your résumé says
6 you "Coordinate internal and external resources to
7 support District initiatives."

8 Were there specific district initiatives
9 that you support in your role as director of Wrap
10 Around and Student Support?

11 A. Yes.

12 Q. And what are those initiatives?

13 A. Around school-based mental health and
14 school-based health centers.

15 Q. What is the school-based mental health
16 initiative?

17 A. That initiative includes assigning a
18 therapist from an external partner to a school, so
19 they can provide direct therapeutic services to
20 students while they're at school, during the school
21 day.

22 Q. You mentioned "external partner." Are
23 there multiple external partners that the DeKalb
24 County School District works with to provide these
25 services?

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1 A. Yes.

2 Q. How many are there?

3 A. Approximately five.

4 Q. Do you know what they are?

5 A. I know a few of them.

6 Q. Okay. What are the ones that you can
7 recall?

8 A. CHRIS 180. Pathways. Summit. Claratel.
9 And Positive Growth.

10 Q. And generally speaking, these are external
11 providers that provide therapists to work in DeKalb
12 County schools?

13 A. Yes.

14 Q. Do they provide any other services to
15 DeKalb County schools?

16 A. They sometimes provide professional
17 development training for teachers. So they may hold
18 a workshop for teachers.

19 Q. Any other services?

20 A. They assist with crisis, when there's a
21 death in the school.

22 Q. Anything else that you can think of?

23 A. No.

24 Q. Do you know how long DeKalb County School
25 District has been using external providers to provide

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1 these services?

2 A. Since before I became employed with the
3 District.

4 Q. So since before July of 2016?

5 A. Yes.

6 MR. REINKE: Let's go off the record for a
7 second.

8 VIDEOGRAPHER: We're going off the record
9 at 11:17. And this ends Media Unit Number 1.

10 (A recess transpired from 11:17 a.m.
11 until 11:18 a.m.)

12 VIDEOGRAPHER: We're back on the record
13 at 11:17. And this begins Media Unit Number 2.

14 BY MR. REINKE:

15 Q. All right, Ms. Revels, you also testified
16 about school-based health centers as one of the
17 initiatives that you support. What are school-based
18 health centers?

19 A. They are essentially a school-based clinic
20 within a school, where we have a full-service medical
21 practice housed within our school.

22 Q. And do you know how many schools within
23 the DeKalb County School District have one of these
24 school-based health centers?

25 A. Two.

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1 Q. And they provide like sort of the full
2 spectrum of medical services that a pediatrician's
3 office would provide?

4 A. Yes.

5 Q. Other than the school-based mental health
6 initiative that we've talked about, and the
7 school-based health centers initiative that we talked
8 about, are there other District initiatives that you
9 support?

10 A. Yes, there are.

11 Q. And what are those?

12 A. The truancy prevention initiative.

13 Q. Any other initiatives?

14 A. The SAFE Center initiative.

15 Q. Anything else?

16 A. Suicide prevention.

17 Q. Any other initiatives that you can think
18 of, as you sit here today, that you support within
19 the DeKalb County School District as -- in your role
20 as director of Wrap Around and Student Support?

21 A. Nothing else off the top of my head.

22 Q. What is the truancy prevention initiative?

23 A. It's our initiative to increase student
24 attendance.

25 Q. And does that initiative have various

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1 programs within it?

2 A. It has various procedures.

3 Q. Procedures that are designed with the goal
4 of increasing student attendance?

5 A. Yes.

6 Q. And what are some of those procedures?

7 A. Having campaigns, having special events
8 throughout the school year. Having back-to-school
9 roundup events, to increase awareness about the first
10 day of school. Lifting up attendance concerns that
11 happen right before or after holidays, and so sending
12 out correspondence to families to remind them when we
13 come back from holidays. Facilitating meetings at
14 schools to track and monitor student attendance.

15 Q. You mentioned the SAFE Center initiative.
16 What is the SAFE Center initiative?

17 A. It's the Student and Family Engagement
18 Center, and it's an initiative where we are providing
19 comprehensive services to students, that include
20 mental health services, and then some economic
21 support in the -- in the way of food or clothing,
22 school supplies a student may need.

23 Q. Then you mentioned the suicide prevention
24 initiative. What is the suicide prevention
25 initiative?

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1 A. It is providing supportive services to
2 students to decrease the number of suicides.

3 Q. What are some of the supportive services
4 that are provided by the suicide prevention
5 initiative?

6 A. Training of staff members to identify
7 symptoms and signs. And it's also the collaboration
8 with those external partners to provide services
9 inside of the schools as well.

10 Q. Are you involved with the training to
11 staff members that's given as part of the suicide
12 prevention initiative?

13 A. I have been.

14 Q. Okay. And I think you testified that that
15 training is to -- for staff members to be able to
16 identify symptoms and signs of risk of suicide. Is
17 that right?

18 A. Yes.

19 Q. Okay. What are some of the symptoms or
20 signs of a risk of suicide that staff members are
21 trained on?

22 A. Students becoming isolated; change of
23 behavior; students neglecting to do their work as
24 assigned; and students verbalizing or expressing that
25 they're suicidal.

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1 Q. Are there any other symptoms or signs that
2 you can recall DeKalb County School District staff
3 being trained on as part of the suicide prevention
4 initiative?

5 A. Watching out for students that are engaged
6 in superficial cutting of themselves.

7 Q. Does the suicide prevention initiative
8 include any training for staff members on like how to
9 prevent suicide, other than recognizing the symptoms
10 and signs?

11 A. Yes.

12 Q. And what do you recall about the content
13 of that training?

14 A. Not leaving students alone or
15 unsupervised; doing a warm handoff with students to
16 another staff member that can provide more intensive
17 support; contacting family members; utilizing the
18 Georgia emergency crisis line, if needed, for
19 additional assistance.

20 Q. Does the suicide prevention initiative
21 training, to your knowledge, include any content
22 about the reasons for student suicide?

23 MR. WALKER: Object to form.

24 THE WITNESS: No, it talks more about the
25 signs and the symptoms and what to look for, and

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1 focusing on what to do to prevent the suicide.

2 BY MR. REINKE:

3 Q. On your résumé, the fourth bullet point
4 says, as part of your role of director of Wrap Around
5 and Student Support, you "provide brief supportive
6 counseling to students and staff experiencing
7 crisis." Is that in connection with like the death
8 of a student or staff member?

9 A. Yes, that's part of it.

10 Q. Okay. Are there other circumstances in
11 which you provide supportive counseling to DeKalb
12 County students as part of your job as director of
13 Wrap Around and Student Support?

14 A. If I am visiting a school to do an
15 observation, and there's a concern at the school, I
16 can meet with a student.

17 Q. Any other circumstances in which you
18 provide supportive counseling to DeKalb County School
19 District students in your current role?

20 A. No.

21 Q. You testified about visiting a school to
22 do an observation. What is an observation?

23 A. To look how a program is being implemented
24 in a school, to evaluate whether it's being
25 implemented with fidelity.

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1 Q. And when you say a "program," are there
2 specific programs that you would go visit schools to
3 take a look at?

4 A. The human trafficking program and the
5 SAFE Center program.

6 Q. Any other specific programs that you
7 recall visiting schools to do an observation of?

8 A. No.

9 Q. In your role as director of Wrap Around
10 and Student Support, how often do you visit schools?

11 A. Weekly.

12 Q. About once per week?

13 A. It varies from week to week.

14 Q. In an average week, in your current role,
15 approximately how much time would you estimate that
16 you spend in schools?

17 A. It's difficult to estimate, because some
18 weeks I may go into schools every day and some weeks
19 I may go to one school. So it's difficult to
20 estimate.

21 Q. And when you visit a school in your
22 current role as director of Wrap Around and Student
23 Support, what do you generally do when you're at the
24 school?

25 A. If there has been a death at the school, I

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1 will meet with the administrator and develop a plan
2 of action how to provide support to students. If I
3 am going to do an observation, then I will go in and
4 either sit in on a session that's being conducted in
5 one of the rooms in the school, in the SAFE Center or
6 some other location in the building. If I'm looking
7 to see if pantries are in place and materials and
8 supplies are stored appropriately, then that's where
9 I'll go in the building.

10 So it depends on what I'm looking for when
11 I go.

12 Q. When you go to a school to do an
13 observation, do you typically sit in on a class?

14 A. I have in the past. It just depends --
15 like I said, it depends what I'm going for.

16 Q. Approximately how often would you estimate
17 that you sit in on a class in your current role as
18 director of Wrap Around and Student Support?

19 A. It's difficult to estimate, because it's
20 varied. I go into schools for different purposes.

21 Q. When was the last time you sat in on a
22 class in your role as director of Wrap Around and
23 Student Support?

24 A. I cannot recall. I can't recall the last
25 time I sat in on a class.

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1 Q. Have you done that like this semester?

2 A. No, I haven't done it this semester.

3 Q. Have you sat in on a class this school
4 year?

5 A. I sat in on a training this school year.

6 Q. And what was that training?

7 A. It was one of our partners meeting with
8 students.

9 Q. Do you recall the specific content of that
10 training?

11 A. I can't.

12 Q. Other than that training, do you recall
13 sitting in any classes this school year?

14 MR. WALKER: Object to form.

15 THE WITNESS: I recall sitting in with
16 students during meetings -- during group
17 meetings.

18 BY MR. REINKE:

19 Q. And what is a group meeting?

20 A. When a group of students are meeting with
21 an adult that's employed by the school.

22 Q. I mean, would that be different than like
23 a teacher teaching during class time?

24 A. Yes, it is. It wasn't with a teacher.

25 Q. We were talking about the District

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1 initiatives that you support in your role as Wrap
2 Around and Student Support. Do you support any
3 district initiatives that are specific to social
4 media?

5 A. I support the -- yes.

6 Q. Okay. And which initiatives that are
7 specific to social media do you support?

8 A. The Yondr pouch initiative.

9 Q. Other than the Yondr pouch initiative, do
10 you support any initiatives that are specific to
11 social media?

12 A. No.

13 Q. What is the Yondr pouch initiative?

14 A. It's the initiative that the District has
15 adopted due to the pervasive use of social media by
16 our students. And so the students, when they come to
17 school in the morning, they have to put their device
18 in a pouch, so that they cannot access platforms
19 during the school day, just distract them from
20 instruction and cause the teachers to lose
21 instructional time.

22 Q. Okay. So the students put their phone
23 into a pouch at the beginning of the day, correct?

24 A. Yes.

25 Q. Then that pouch is locked?

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1 A. It is.

2 Q. So they can't use their phone for any
3 purpose when it's in the pouch, correct?

4 A. That's the intention.

5 Q. Okay. What is your role in relation to
6 the Yondr pouch initiative?

7 A. I was on the committee to discuss how to
8 roll out the initiative, and looking at the
9 information that we had at the time to make decisions
10 about how to effectively intervene in what was going
11 on with the students.

12 Q. You said you were on the committee to
13 discuss how to roll out the initiative. Do you
14 recall when those discussions took place?

15 A. Discussions may have started -- and I
16 don't know exactly when -- but it was before last
17 summer.

18 Q. So before the summer of 2024?

19 A. Yes.

20 Q. And then Yondr pouches were implemented in
21 a pilot of ten DeKalb County schools in fall 2024,
22 correct?

23 A. Yes.

24 Q. Since the implementation in fall 2024,
25 have you had any role in the Yondr pouch initiative?

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1 A. No, not a specific role.

2 Q. Other than the positions that are
3 reflected on your résumé, have you held any positions
4 in education?

5 A. No.

6 Q. If you could turn to the last page of your
7 résumé. You list several certifications.

8 The first certification that's listed on
9 your résumé is "State of Georgia Leadership
10 Certification"?

11 A. Yes.

12 Q. And what is that?

13 A. It indicates that I am a certified leader,
14 of professional standards.

15 Q. And is that a current certification that
16 you hold?

17 A. Yes, it is.

18 Q. The next certification on your résumé is a
19 "State of Georgia Service 5 Certification." What is
20 that certification?

21 A. That is in relation to being a certified
22 social worker.

23 Q. And what does Service 5 mean?

24 A. It's the -- it just it means I have a
25 master's.

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1 Q. And then -- is that a current
2 certification?

3 A. Yes, it is.

4 Q. You're also a "licensed clinical social
5 worker"?

6 A. Yes, I am.

7 Q. And is your license current?

8 A. Yes, it is.

9 Q. You're an "ethics in the workplace
10 trainer"?

11 A. Yes.

12 Q. What is that?

13 A. When I worked with Atlanta Public Schools,
14 we had to become certified in ethics in the
15 workplace.

16 Q. And do you recall who gave you that
17 certification?

18 A. I cannot.

19 Q. You are also a "QPR suicide prevention
20 trainer"?

21 A. Yes.

22 Q. What is a QPR suicide prevention trainer?

23 A. "QPR" stands for question, persuade, and
24 response. And it's a training that we provide to
25 staff members to recognize the signs and symptoms of

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1 someone who may be suicidal, and how to respond.

2 Q. Is this the training that we were
3 previously discussing about the suicide prevention
4 initiative?

5 A. It's a portion of it.

6 Q. Okay. And do you provide that training to
7 DeKalb County School District employees?

8 A. Not currently.

9 Q. Have you done that in the past?

10 A. I have.

11 Q. When was the last time you provided that
12 training to DeKalb County School District employees?

13 A. As a coordinator.

14 Q. So that would have been sometime during
15 the time frame of July 2017 through 2022?

16 A. Yes.

17 Q. You're also listed -- or it's listed on
18 your résumé that you are a "darkness to light
19 trainer." What is a darkness to light trainer?

20 A. It's a training to prevent child sexual
21 abuse.

22 Q. And you're a "certified mediator"?

23 A. Yes.

24 Q. Where is that certification from?

25 A. I can't recall.

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1 Q. And then you're listed as a "former mental
2 health first aid trainer."

3 A. Yes.

4 Q. What is a mental health first aid trainer?

5 A. Mental health -- mental health first aid
6 is a specific training curriculum.

7 Q. And that's the mental health first-aid
8 curriculum that we discussed earlier?

9 A. Yes, it is.

10 Q. Okay. You're a former trainer for that
11 curriculum?

12 A. Yes.

13 Q. So your certification has expired?

14 A. Yes.

15 Q. Do you recall when it expired?

16 A. 2020. Between 2020 and 2021.

17 Q. There is an organization listed on your
18 résumé, School Social Workers Association of Georgia.
19 Do you hold any positions currently within that
20 organization?

21 A. No, I do not.

22 Q. Other than what's reflected on your
23 résumé, do you have any other formal training or
24 certifications in mental health?

25 A. No, I do not.

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1 Q. You were employed by DeKalb County School
2 District during the COVID-19 pandemic; is that
3 correct?

4 A. Yes, I was.

5 Q. Would you agree that the pandemic caused
6 stress for people all around the world?

7 MR. WALKER: Object to form.

8 THE WITNESS: Yes, I do.

9 BY MR. REINKE:

10 Q. Okay. And that would include students
11 within the DeKalb County School District?

12 MR. WALKER: Object to form.

13 THE WITNESS: The pandemic caused stress
14 for everyone.

15 BY MR. REINKE:

16 Q. Okay. Including DeKalb County School
17 District students?

18 A. Students were very stressed, yes.

19 Q. Would you agree that students within the
20 School District experienced anxiety as a result of
21 the pandemic?

22 MR. WALKER: Object to form.

23 THE WITNESS: I don't know if they
24 suffered anxiety because of the pandemic, but
25 the pandemic caused a great deal of stress.

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1 BY MR. REINKE:

2 Q. The DeKalb County School District
3 suspended in-person learning during the COVID-19
4 pandemic; is that correct?

5 A. Yes.

6 Q. In fact schools within the DeKalb County
7 School District were closed for approximately one
8 year during the pandemic, correct?

9 A. Yes.

10 Q. And during that time, there was virtual
11 instruction?

12 A. Yes.

13 Q. Would you agree that disruptions to school
14 instructional time can have mental health impacts on
15 students?

16 MR. WALKER: Object to form.

17 THE WITNESS: Can you restate the
18 question, please?

19 BY MR. REINKE:

20 Q. Do you believe that disruptions to
21 instructional time could adversely affect student
22 mental health?

23 MR. WALKER: Object to form.

24 THE WITNESS: Students were definitely
25 disrupted from receiving instruction in a

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1 traditional way during COVID. And so that could
2 lead to some concerns.

3 BY MR. REINKE:

4 Q. Some concerns with respect to student
5 mental health?

6 A. It can lead to concerns with academic
7 performance, with their ability to engage
8 effectively, with them feeling isolated. And with
9 them becoming anxious, they become depressed.

10 Q. Did you play any role in the decision of
11 the DeKalb County School District to transition to
12 virtual learning during the COVID-19 pandemic?

13 A. No.

14 Q. Did you play any role in like the process
15 for transitioning to virtual learning?

16 A. No, I did not.

17 Q. I'm going to show you a document that we
18 will mark as Exhibit 5, which is Tab 3.

19 (DeKalb-Revels Exhibit 5 was marked for
20 identification.)

21 BY MR. REINKE:

22 Q. And if you could, please, take a moment to
23 review this document. And let me know when you've
24 completed your review.

25 Have you finished?

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1 A. Yes.

2 Q. Okay. At the bottom of the document,
3 there's an e-mail from Deborah Moore-Sanders, dated
4 October 25th, 2020, that was sent to you along with
5 several other individuals. Correct?

6 A. Yes.

7 Q. And if you flip over to the second page,
8 Dr. Moore-Sanders' title at the time was executive
9 director of culture and climate, correct?

10 A. Yes.

11 Q. At this time, October 25th of 2020, you
12 were coordinator of social work services for the
13 DeKalb County School District, correct?

14 A. Yes.

15 Q. Dr. Moore-Sanders said, "Greetings team,
16 Please see the attached document that addresses how
17 the District is handling mental health support. This
18 has been a revolving question so I am providing a
19 summary of services. Please review and provide
20 feedback." Correct?

21 A. Yes.

22 Q. Okay. And then you responded to the
23 e-mail, looks like later that day, saying, "Sorry for
24 the delay. Looks good, includes everything that we
25 are doing. I changed the first sentence. See what

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1 you think. I also highlighted a couple of things."
2 Correct?

3 A. Yes.

4 Q. And it looks like you attached a document
5 to that e-mail called "Addressing Mental Health
6 Needs - October 26, 2020." Correct?

7 A. Yes.

8 Q. I'm going to show you a document that we
9 will mark as Exhibit 6, which is Tab 3.

10 (DeKalb-Revels Exhibit 6 was marked for
11 identification.)

12 BY MR. REINKE:

13 Q. And if you could, please, take a moment to
14 review Exhibit 6, and tell me when you have completed
15 your review.

16 This was Tab 2. You got it right.

17 A. Okay.

18 Q. Okay. Is this the document that was
19 attached to the e-mail that we just reviewed as
20 Exhibit 5?

21 A. I am not 100 percent sure, because I don't
22 have the e-mail, but . . .

23 Q. Well, the e-mail --

24 A. I'm familiar with this document. I mean,
25 I don't know if this is exactly what I attached, but

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1 I'm familiar with this document.

2 Q. Okay. You're familiar with this document.

3 So this is the document that provides a
4 summary of the mental health services that the DeKalb
5 County School District was offering to its students
6 during the COVID-19 pandemic, correct?

7 A. Yes.

8 Q. Okay. And did you assist at all in
9 preparing this document?

10 A. Yes, I did.

11 Q. Do you recall reviewing this document and
12 providing feedback on it?

13 A. Yes.

14 Q. And you provided that feedback to
15 Dr. Moore-Sanders, correct?

16 A. Yes, I did.

17 Q. And if you could go back to Exhibit 5,
18 which is the e-mail we were looking at before we
19 looked at this document.

20 And in the top -- in your e-mail to
21 Dr. Moore-Sanders, you said, "Looks good, includes
22 everything that we are doing. I changed the first
23 sentence."

24 And then going back to Exhibit 6, the
25 first sentence of Exhibit 6 says, "The sudden and

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1 unexpected transition from the familiar teaching
2 structure to a virtual platform can have an enormous
3 impact on students and staff, academically, socially
4 and emotionally."

5 Is that a sentence that you drafted?

6 A. Based on this e-mail, it is.

7 Q. Okay. And do you agree with that
8 statement?

9 A. Yes.

10 Q. The next sentence says, "Closing a school
11 district can have an enormous impact on students and
12 staff in terms of addressing mental
13 health/social-emotional needs."

14 Do you agree with that statement?

15 A. Yes.

16 Q. And then the next sentence says, "Students
17 many" -- which looks like it's just a stray word --
18 "may experience an increased level of stress or
19 anxiety due to factors such as missing their friends,
20 being in a digital world too long, struggling with
21 time management, not understanding specific content
22 when required to work independently, or simply being
23 overwhelmed."

24 Do you agree with that statement?

25 A. Yes.

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1 Q. And are the items listed in this paragraph
2 issues that DeKalb County School District students
3 experienced during the period of virtual learning as
4 a result of the COVID-19 pandemic?

5 A. Yes, these are issues students
6 experienced.

7 Q. Now, this memo goes on to describe
8 several -- provides a summary of -- of several mental
9 health resources that the DeKalb County School
10 District was employing to address the mental health
11 needs of students and staff and parents during the
12 pandemic, correct?

13 A. Yes.

14 Q. And if you flip to the second page --
15 actually, first page, sorry.

16 The last bullet point on the first page
17 says, "School psychologists and school social workers
18 are available to their schools to address parental
19 and teacher concerns on topics such as anxiety,
20 stress, suicidal ideation, recognizing mental health
21 symptoms, and/or being overwhelmed."

22 Did I read that correctly?

23 A. Yes.

24 Q. Now, in your role as coordinator of social
25 work services, you did not oversee the school

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1 psychologists, correct?

2 A. No, I did not.

3 Q. But you did oversee school social workers?

4 A. Yes, I did.

5 Q. Would you agree that the school social
6 workers were an important part of DeKalb County
7 School District's mental health resources that were
8 available during the pandemic?

9 A. Yes.

10 Q. And what types of support services were
11 DeKalb County School District social workers
12 providing during the pandemic?

13 A. Some of the social workers were providing
14 like open office hours, so that if someone needed to
15 talk to them, they could sign -- they could sign
16 in -- unscheduled appointments type of -- it's like a
17 block of time, so that people can sign in and talk to
18 them if they needed to talk to them, both for
19 students and adults.

20 And they also were able to provide brief
21 supportive counseling to students, if there were any
22 concerns that they presented with and they wanted to
23 talk to someone about it.

24 Students were also able to click on a --
25 click on a link to say "I'm being abused." "I'm

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1 being molested." "Someone is hurting me at home."
2 And the social worker could reach out to that student
3 and talk to them about it.

4 Q. Okay. Are there any other services that
5 DeKalb County School District social workers were
6 providing to students, that you can recall, during
7 the pandemic?

8 A. Yes. We were giving out food on a weekly
9 basis to families through our partnership with the
10 food bank. We were still making home visits to
11 ensure that students were receiving instruction. We
12 were delivering devices to students.

13 Q. When you say you were "delivering devices
14 to students," what kind of devices?

15 A. Laptops.

16 Q. Were those like Chromebooks?

17 A. Yes.

18 Q. Issued by the District?

19 A. Yes.

20 Q. And that was so students could participate
21 in virtual learning?

22 A. Yes.

23 Q. You mentioned that DeKalb County School
24 District social workers were providing grief support
25 or counseling for students during the COVID-19

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1 pandemic, correct?

2 A. Yes.

3 Q. What is grief supportive counseling?

4 A. Oh, not "grief." "Brief."

5 Q. Oh, "brief"?

6 A. Yes.

7 Q. Okay, okay. Sorry.

8 Brief supportive counseling?

9 A. Yes. I'm sorry.

10 Q. All right. And what would -- so
11 supportive counseling could be, you know, addressing
12 various mental health issues, correct?

13 A. Yes.

14 Q. And what would be some of the mental
15 health issues that DeKalb County School District
16 social workers were addressing during the pandemic?

17 A. Suicidal ideation. Depression. Social
18 isolation. Students acting as parents during the
19 pandemic.

20 So any issue that came up that a student
21 wanted to express concerns about.

22 Q. During the COVID-19 pandemic, was there an
23 increase in demand for these counseling sessions
24 compared to before the pandemic?

25 A. The demand changed, just because the --

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1 the method of interacting with the students changed.
2 And so it's difficult to say whether it was an
3 increase or not, because our enrollment declined so
4 much. And so it's kind of difficult to give it -- to
5 quantify it.

6 Q. When you say "the demand changed," what do
7 you mean by that? Like how did it change?

8 A. We were no longer able to -- to see a
9 student that is upset, to see them in our face. And
10 so it was just difficult -- it was a little bit more
11 difficult to recognize if a student needed help.

12 Q. Because of the lack of face-to-face
13 interaction?

14 A. Yes.

15 MR. REINKE: Okay. We're almost at noon,
16 so we can go off the record and take a lunch
17 break.

18 VIDEOGRAPHER: We're going off the record
19 at 11:56.

20 (A recess transpired from 11:56 a.m. until
21 12:48 p.m.)

22 VIDEOGRAPHER: We're back on the record at
23 12:48.

24 BY MR. REINKE:

25 Q. All right, Ms. Revels. I'm going to show

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1 you another document that we'll mark as Exhibit 7.

2 (DeKalb-Revels Exhibit 7 was marked for
3 identification.)

4 BY MR. REINKE:

5 Q. And this one will be very quick. This --
6 this is Tab 5.

7 And this looks like an e-mail that you
8 sent to yourself, with an attachment. Correct?

9 A. Yes.

10 MR. REINKE: And I'll mark as Exhibit 8
11 the document that was produced by DeKalb County
12 School District as the attachment to this
13 e-mail. And that's Tab 4.

14 (DeKalb-Revels Exhibit 8 was marked for
15 identification.)

16 BY MR. REINKE:

17 Q. If you could please take a moment to
18 review the document that I've marked as Exhibit 8,
19 and tell me if you recognize that document.

20 A. Okay.

21 Q. Do you recognize that document?

22 A. Yes.

23 Q. And what is this document?

24 A. These were notes that I typed to myself.

25 Q. Okay. And do you recall why you typed

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1 these notes?

2 A. Based on the subject of the e-mail, I may
3 have been working on a grant.

4 Q. Do you recall working on a grant related
5 to obtaining additional social worker resources after
6 the pandemic?

7 A. I don't recall which grant that could have
8 been.

9 Q. All right. So you don't recall
10 specifically -- like a specific grant in which you
11 made these notes in connection with?

12 A. I don't.

13 Q. Okay. If we can take a look at the notes
14 that we've marked as Exhibit 8, the first sentence
15 says, "School social workers (SSW) will be
16 instrumental in providing for student care in the
17 aftermath of the COVID-19 pandemic." Correct?

18 A. Yes.

19 Q. Were school social workers in the DeKalb
20 County School District instrumental in providing for
21 student care in the aftermath of the pandemic?

22 A. Yes.

23 Q. Okay. And then the next sentence says,
24 "Students facing challenges regarding increased
25 anxiety, grief and loss, depression, social phobia

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1 and other mental health challenges will need to be
2 provided with supportive services in order to
3 transition back into the school setting."

4 Is that correct?

5 A. Yes.

6 Q. And is this sentence describing challenges
7 that students in the DeKalb County School District
8 faced as a result of the COVID-19 pandemic?

9 MR. WALKER: Object to form.

10 THE WITNESS: We had to try to anticipate
11 what we may see when students returned.

12 BY MR. REINKE:

13 Q. When they returned from the virtual
14 learning during the pandemic?

15 A. Yes.

16 Q. Okay. And did you in fact see anxiety in
17 students after they returned to virtual learning from
18 the pandemic?

19 A. We did see students with an increased
20 level of anxiety.

21 Q. And did you see students that had an
22 increased level of grief and -- grief and loss when
23 they returned from the period of virtual learning
24 during the COVID-19 pandemic?

25 A. We did.

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1 Q. Did you also see students in the DeKalb
2 County School District that had an increased level of
3 depression when they returned from virtual learning
4 during the COVID-19 pandemic?

5 A. Yes, we did.

6 Q. Did you also see students in the DeKalb
7 County School District that had -- that were
8 experiencing social phobia when they returned from
9 virtual learning after the COVID-19 pandemic?

10 A. Yes, we did.

11 Q. And what is social phobia?

12 A. When it -- when a person experiences some
13 level of anxiety in relation to being in social
14 situations around large crowds of people.

15 Q. Okay. So it's fair to say, then, that
16 DeKalb County School District students faced a number
17 of mental health challenges when they returned to
18 school from virtual learning after the COVID-19
19 pandemic?

20 A. Yes.

21 Q. The next sentence says, "SSWs" -- which
22 are school social workers, correct? -- "will partner
23 with CASEL to receive enhanced training around
24 implementing a social-emotional learning model with
25 students in order to restore a sense of normalcy in

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1 schools." What is "CASEL"?

2 A. It's an SEL platform, an SEL program.

3 Q. Okay. And do you know specifically what
4 those letters stand for?

5 A. "SEL" is social-emotional learning. CASEL
6 is a company that provides those services. I'm not
7 sure what "CA" stands for right now.

8 Q. But the company is pronounced "castle"?

9 A. Yes.

10 Q. What is social-emotional learning?

11 A. It's -- it's teaching children soft skills
12 around self-regulation, social interaction,
13 decision-making. It's teaching students a variety of
14 skills in order to negotiate themselves in the world.

15 Q. And it looks like this paragraph is
16 discussing implementing a training associated with a
17 social-emotional learning model in the DeKalb County
18 School District after the pandemic. Is that correct?

19 A. Yes.

20 Q. And did the DeKalb County School District
21 implement such a training?

22 A. We did not move forward with CASEL.

23 Q. Is there any particular reason why the
24 School District did not move forward with CASEL?

25 A. We already had some SEL information, and I

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1 think we continued to move forward with the SEL
2 information that we already had.

3 Q. Okay. When you say that the District
4 already had SEL information, what kind of information
5 did the District have?

6 A. We had -- we used SEL curriculum
7 information from a different program.

8 Q. And how did the DeKalb County School
9 District use this SEL curriculum information?

10 A. We taught those soft skills to students
11 through the Second Step program.

12 Q. Is that something that was taught to all
13 students within the DeKalb County School District?

14 A. It was really geared towards elementary
15 students. It was geared primarily towards elementary
16 and maybe middle school students.

17 Q. Okay. And it was geared toward elementary
18 and maybe middle school students that were returning
19 to in-person learning after the pandemic; is that
20 right?

21 A. So that's a program that we had
22 prepandemic.

23 Q. Okay.

24 A. And so we wanted -- we wanted to continue
25 that program.

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1 Q. Okay. So you continued the program after
2 the pandemic?

3 A. We did.

4 Q. And would it have been given to all
5 elementary schools, when they returned -- all
6 elementary school students, when they returned to
7 in-person learning?

8 A. The program was provided to all elementary
9 schools so that the counselor could redeliver the
10 program. However, it may not have been provided to
11 every single student in the schools. I can't
12 guarantee that every counselor actually implemented
13 the program.

14 Q. Was it your intent that it would be
15 provided to every student in elementary schools?

16 A. It was the intent that we would provide
17 some level of support, SEL support. And so if you're
18 not providing Second Step, do something to build
19 character amongst students.

20 Q. What was the content of this Second Step
21 training program that was provided specifically after
22 students returned to in-person learning following the
23 pandemic?

24 A. The program had a child safety component
25 to it. And it also had components, like I said, with

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1 soft skills, character-building, building empathy,
2 coping skills; just teaching children how to interact
3 with one another, be sensitive to one another's
4 needs, and interact in a peaceful way and not a
5 conflictual-type way.

6 Q. Is there any content that this program
7 that was specifically focused on social media?

8 MR. WALKER: Object to form.

9 THE WITNESS: I did not manage that
10 curriculum, and so I'm not really sure about
11 every component of it.

12 BY MR. REINKE:

13 Q. Okay. But as you sit here today, are you
14 personally aware of any component of this program
15 that was specifically focused on social media?

16 A. The child safety piece could have had a
17 component that focused on social media. Like I said,
18 I wasn't intimately -- one of the people that did the
19 training for that curriculum, so I'm not sure. So I
20 can't say that it did not -- affirm -- solely on
21 that.

22 Q. Okay. You said it could have had a
23 component that focused on social media. It also
24 could not have had that; you just don't know either
25 way. Right?

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1 A. I'm not sure if it had that component or
2 not.

3 Q. Okay. You also testified that it was your
4 intention to provide some level of SEL support to all
5 students in the DeKalb County School District after
6 they returned to in-person learning following the
7 pandemic. Was there any SEL support that was
8 provided to DeKalb County students when they returned
9 to in-person learning following the pandemic that
10 specifically focused on social media?

11 A. We had conversations with our schools and
12 our teachers and our leaders to discuss how we could
13 effectively provide instruction to the students and
14 alleviate any distractions that social media
15 platforms were creating for our students.

16 Q. And did you personally participate in
17 these conversations?

18 A. Yes, I did.

19 Q. Who were the -- how many times do you
20 recall discussing this?

21 A. We discussed -- so our team of leaders, we
22 discussed at our monthly meetings what we could do to
23 help support students reentering school, and how we
24 could help support our instructional leaders in the
25 building and not have to support students that were

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1 not following directions. And so it was ongoing
2 conversation.

3 Q. And how many times do you specifically
4 recall discussing social media as part of these
5 conversations?

6 A. It came up -- it came up -- like we had
7 meetings weekly, and then we had meetings monthly,
8 with different groups. And so it would come up -- at
9 least monthly it was coming up, because it was a
10 pervasive issue, once we returned. And we really had
11 to work on -- how do we create some structure around
12 students paying attention.

13 Q. Do you recall any specific conversations
14 about -- or do you recall any specific mentions of
15 social media in these conversations that you're
16 describing?

17 A. I recall conversations about how to handle
18 the disciplinary concern that came up due to the use
19 of social media. We were trying to decrease
20 suspensions.

21 Q. And who do you recall having those
22 conversations with?

23 A. With our internal leadership, when we had
24 our monthly meetings.

25 Q. When you say "internal leadership," are

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1 there specific individuals that you're referring to?

2 A. It would be the deputy -- the deputy
3 superintendent and the other coordinators.

4 Q. Was the deputy superintendent at the time
5 Dr. Moore-Sanders?

6 A. Yes, it was.

7 Q. Okay. And when you say "the other
8 coordinators," who are you referring to?

9 A. The coordinator of counseling, coordinator
10 of psychological services.

11 Q. You said that the conversation with these
12 individuals was about how to handle the disciplinary
13 concerns related to social media, and I think you
14 mentioned specifically reducing suspensions. Do you
15 recall anything else about that conversation?

16 A. We wanted to make sure that our team that
17 were -- that were based in the schools could provide
18 some support to those students, instead of them being
19 suspended, out of school. So we wanted to provide
20 support for students in school.

21 Q. And did your team provide support to
22 students in school in that regard?

23 A. We did.

24 Q. And how did your team do that?

25 A. We were able to meet with students and

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1 discuss with them some alternative behaviors that
2 would be more positive and would not lead to them
3 being suspended.

4 Q. And do you know approximately how many of
5 these meetings with students occurred?

6 A. I don't have any numbers.

7 Q. Do you know if these meetings with
8 students were documented in any way?

9 A. We encourage our staff members to document
10 meetings with students for any issue that they're
11 talking about.

12 Q. And is there a specific way that you
13 encourage staff members to document meetings with
14 students?

15 A. Through Infinite Campus.

16 Q. Okay. Is there anything else you recall
17 about your conversations with Dr. Moore-Sanders and
18 the other coordinators about how to handle
19 disciplinary concerns regarding social media --

20 A. No.

21 Q. -- in the wake of the pandemic?

22 A. No, there's not.

23 Q. I'm going to show you another document
24 that we'll mark as Exhibit 9, or -- sorry. It's
25 Tab 9 and Exhibit 9. Okay. Got my numbers confused

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1 for a second.

2 (DeKalb-Revels Exhibit 9 was marked for
3 identification.)

4 MR. REINKE: No, it's not Tab 9; it's
5 Tab 76, Exhibit 9.

6 BY MR. REINKE:

7 Q. If you could please take a moment to
8 review the document that I've marked as Exhibit 9.
9 And let me know when you've completed your review.

10 A. Okay.

11 Q. Okay. Have you reviewed Exhibit 9?

12 A. I have.

13 Q. And at the top e-mail on the chain, it
14 looks like Dr. Towns is forwarding you and a number
15 of other people the e-mail that is the second e-mail
16 in the chain. Correct?

17 A. Yes.

18 Q. Okay. And that second e-mail on the chain
19 that Dr. Towns was forwarding to you is from somebody
20 named Michelle Sandrock. Do you know who that is?

21 A. Yes, I do.

22 Q. Okay. And who is she?

23 A. She works with Metro RESA.

24 Q. What is Metro RESA?

25 A. It's the Metro Regional Education --

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1 something -- Association. I can't remember exactly
2 what it's for.

3 Q. Okay. And do you know what the function
4 of that organization is?

5 A. I don't. I've never worked with that
6 organization.

7 Q. Is that an organization that, to your
8 knowledge, works with the DeKalb County School
9 District?

10 A. They do.

11 Q. And do you know what they do for the
12 DeKalb County School District?

13 A. Oftentimes they provide trainings for
14 staff members.

15 Q. Do you know what kind of trainings they
16 provide?

17 A. Around PBIS and restorative practices.

18 Q. And it looks like the e-mail that you were
19 forwarded from Dr. Towns says, "Good morning PBIS DCs
20 and external coaches.

21 "Late Friday GaDOE sent out some relevant
22 information that I wanted to make you aware of as it
23 relates to SEL/mental health/school climate. Please
24 make you plan and discuss with your
25 superintendent/District leadership regarding the

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1 Student Wellness Survey as there is no mandatory
2 participation, but the data will likely be helpful
3 for future planning of your school climate/mental
4 health initiatives."

5 Is "GaDOE" that's referred to here, is
6 that the Georgia Department of Education?

7 A. Yes, it is.

8 Q. And do you recall the Georgia Department
9 of Education providing resources to the DeKalb County
10 School District to address mental health issues as a
11 result of the pandemic?

12 A. I recall, yes.

13 Q. Okay. And -- and what were some of those
14 resources?

15 A. Links. They sent links to us.

16 Q. Okay. When you say "they sent links," you
17 mean like a -- a link to like online resources?

18 A. Yes.

19 Q. Okay. Do you recall the Georgia
20 Department of Education providing any other resources
21 to the DeKalb County School District in the wake of
22 the COVID-19 pandemic?

23 A. No.

24 Q. This e-mail refers to a mental health
25 symposium. And it says, "The ripple effects of the

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1 COVID-19 pandemic are many, including the impact of
2 isolation and other factors on the well-being of
3 individuals. The Georgia Department of Education is
4 dedicated to providing training and resources to
5 equip school staff with knowledge and skills to
6 support the mental health and well-being of students,
7 staff, and other members of the school community.
8 Since 2018, the RESA/GaDOE MHAT project has provided
9 no cost mental health awareness training through
10 schools, districts, and RESAs to over 28,000 school
11 staff throughout the state in a blend of face-to-face
12 and online platforms."

13 Have you ever attended any training
14 provided by the Georgia Department of Education about
15 the mental health and well-being of students?

16 A. I cannot recall.

17 Q. The paragraph continues, "Join us
18 virtually February 22 through 24th, 2021, for Coping
19 With COVID-19: Supporting Mental Health in Our
20 Schools, a mental health awareness training
21 symposium." Correct?

22 A. Yes.

23 Q. Do you recall if you attended the Coping
24 With COVID-19: Supporting Mental Health in Our
25 Schools training symposium that's referred to in this

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1 paragraph?

2 A. I do not recall.

3 Q. Do you know if anybody in the DeKalb
4 County School District attended that symposium?

5 A. I'm not sure.

6 Q. The next paragraph in this e-mail is
7 titled "Student Wellness Survey."

8 And the first sentence says, "The Georgia
9 Student Health Survey, Georgia Parent Survey, and
10 Georgia School Personnel Survey will not be
11 administered during the 2020 through 2021 school
12 year." Are you familiar with the Georgia Student
13 Health Survey?

14 A. Yes, I am.

15 Q. What is the Georgia Student Health Survey?

16 A. It's a survey that the State sends out for
17 students to complete regarding their well-being at
18 school.

19 Q. Okay. You say it's a survey that the
20 State sends out. Is that the State Department of
21 Education?

22 A. Yes.

23 Q. And the survey is for students to
24 complete. So is it sent to DeKalb County School
25 District students?

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1 A. Yes.

2 Q. Do you know how often that survey is sent
3 to DeKalb County School District students?

4 A. I can't recall.

5 Q. In your role with the DeKalb County School
6 District, do you receive the results of the Georgia
7 Student Health Survey for DeKalb County School
8 District students?

9 A. No. You have to search for the results.

10 Q. Have you ever looked at the results of the
11 Georgia Student Health Survey for DeKalb County
12 School District students?

13 A. Yes.

14 Q. And -- and when have you looked at the
15 results of that survey?

16 A. Prepandemic.

17 Q. Do you recall looking at the results of
18 that survey more than once?

19 A. I cannot recall the exact number of times
20 I've pulled the survey.

21 Q. Do you recall if you've ever looked at the
22 results of that survey after the pandemic?

23 A. I can't recall, because they stopped
24 sending it at some point. So I can't recall.

25 Q. When you say "they stopped sending it at

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1 some point," what do you mean by that?

2 A. GaDOE didn't send it out to the students
3 for a couple years. And so I'm just not sure of when
4 they stopped and started. It was a -- there was a
5 break.

6 Q. When -- when you say "GaDOE," do you mean
7 the Georgia Department --

8 A. The Georgia Department --

9 Q. -- of Education?

10 A. -- of Education, yes.

11 Q. All right. You said they stopped sending
12 it at some point for a couple years. Have they
13 started sending it again, do you know?

14 A. I can't recall.

15 Q. You testified that before the pandemic,
16 you looked at the results of the Georgia Student
17 Health Survey. For what purpose were you looking at
18 the results of that survey?

19 A. For data related to children wanting to
20 complete suicide.

21 Q. Okay. Was there a particular reason why
22 you were looking at that data?

23 A. I believe we were just wanting to gauge
24 the services that we would provide to students to
25 provide support.

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1 Q. And did the data that you reviewed assist
2 you in doing that?

3 A. It did.

4 Q. How so?

5 A. We saw that students were identifying on
6 the survey that they had been thinking about suicide
7 in the past.

8 Q. Do you consider the data in the Georgia
9 Student Health Survey to be reliable?

10 MR. WALKER: Object to form.

11 THE WITNESS: It's student report, and so
12 as reliable as student report in that format,
13 where there is a level of anonymity, I can't
14 really attest whether that information is
15 accurate or not.

16 BY MR. REINKE:

17 Q. Okay. Do you have any reason to like
18 doubt the veracity of these surveys?

19 MR. WALKER: Object to form.

20 THE WITNESS: I really can't even
21 formulate, you know, what Georgia Department of
22 Education is using as their validity instrument
23 for that.

24 BY MR. REINKE:

25 Q. Okay. You -- you just don't know how they

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1 validate the data?

2 A. I don't.

3 Q. Okay. Do you know if anybody else within
4 the DeKalb County School District uses Georgia
5 Student Health Surveys for any purpose?

6 A. I wouldn't know what any other division
7 was doing.

8 Q. Have you ever had any conversations with
9 anybody in the DeKalb County School District about
10 the results of Georgia's Student Health Surveys?

11 A. Yes, I have.

12 Q. Okay. And tell me about those
13 conversations.

14 A. I've had conversations with the social
15 workers around it increasing the level of sensitivity
16 when students present with mental health concerns.

17 Q. And when you say "increasing the level of
18 sensitivity," what do you mean about that?

19 A. To ensure they are having a thorough
20 conversation with students, to rule out suicidal
21 ideation.

22 Q. Okay. So to ensure that the social worker
23 is discussing -- is having a thorough conversation
24 with students?

25 Yes?

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1 A. Yes.

2 Q. Okay. And does -- Georgia Student Health
3 Surveys came up in these conversations?

4 A. Yes.

5 Q. How so?

6 A. I told them that they could take a look at
7 the Georgia Student Health Survey, so that they
8 could -- so that they could just see for themselves
9 the type of numbers that were coming up.

10 Q. Okay. Other than these conversations with
11 social workers that you've described, have you had
12 any other conversations with anybody in the DeKalb
13 County School District about Georgia Student Health
14 Surveys?

15 A. No.

16 Q. This e-mail also refers to Georgia Parent
17 Surveys. Is that something that you're familiar
18 with?

19 A. No. That doesn't come out of my division.

20 Q. Okay. And this e-mail refers to Georgia
21 School Personnel Surveys. Is that something you're
22 familiar with?

23 A. I've completed it.

24 Q. Okay. And is that a survey that's also
25 given by the Georgia Department of Education?

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1 A. I believe so.

2 Q. And how many times do you recall
3 completing that survey?

4 A. Whenever it's sent out. I'm not sure of
5 the cadence at which it's sent out, though.

6 Q. Okay. And do you recall ever looking the
7 results of the Georgia School Personnel Survey?

8 A. No, I haven't.

9 Q. This e-mail refers to a Student Wellness
10 Survey that was sent out by Metro RESA, correct?

11 A. Yes. I'm actually not sure if Georgia
12 Department of Education sent it out, or Metro RESA.

13 Q. Okay. Fair enough. But this refers to
14 something called the Student Wellness Survey,
15 correct?

16 A. Yes.

17 Q. Do you know if that Student Wellness
18 Survey was administered to DeKalb County School
19 District students?

20 A. I'm not sure if it was.

21 Q. Okay.

22 A. It's not our instrument.

23 Q. But you didn't play any role in the
24 administration of a Student Wellness Survey to DeKalb
25 County School District students, fair?

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1 A. Not that I can recall.

2 Q. Okay. Now, I want to talk to you a bit
3 about SAFE Centers. And I know that you testified
4 when we were talking about your job descriptions that
5 that part of your role has to do with SAFE Centers,
6 correct?

7 A. Yes.

8 Q. What is a SAFE Center?

9 A. It's a Student and Family Engagement
10 Center that provides comprehensive services to
11 students. The services include mental health
12 services, conflict resolution skills, food pantry.
13 It may have a clothing closet, and it provides
14 students with support in any areas they may present
15 concerns.

16 Q. Okay. You mentioned mental health
17 services. What types of mental health services are
18 provided in SAFE Centers?

19 A. The individual mental health services
20 that -- that I mentioned earlier, that were provided
21 by those five different partners. And mental health
22 services are also provided in the form of group
23 meetings. We also have providers that come and teach
24 different skills, like violence prevention or gang
25 prevention, or just different -- address different

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1 concerns that we see in schools.

2 Q. The five service providers, are you
3 referring to the five partners that provide
4 counseling to DeKalb County School District students?

5 A. Yes, I am.

6 Q. Including like CHRIS 180?

7 A. Yes, and Pathways, yes.

8 Q. And they provide these services within
9 SAFE Centers?

10 A. In those schools that have SAFE Centers.

11 Q. Do they also provide services in schools
12 that do not have SAFE Centers?

13 A. Yes, they do.

14 Q. And in that instance, where do they
15 provide those services?

16 A. They are provided with a confidential
17 meeting area in those schools.

18 Q. You mentioned -- are there other mental
19 health services that the SAFE Centers provide?

20 A. We -- in order to start a SAFE Center, we
21 conduct a survey of sorts, with students in that
22 school, to determine the needs; and then we look at
23 the demographics of the school. And so if a school
24 has a high number of students that are teen parents,
25 we may provide a teen parenting program.

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1 And so we just look at the individual
2 needs of the schools, and then we'll provide services
3 based on the needs that are presented.

4 Q. Okay. So the services -- the mental
5 health services that are provided with any particular
6 SAFE Center could vary from school to school,
7 depending on what the needs of that particular school
8 are?

9 A. The programs. And so we have -- our
10 standard in the SAFE Center is to provide the
11 therapy, the therapeutic services, that we provide
12 that as standard level of care at all six SAFE
13 Centers.

14 In addition to that, we have partnerships
15 with various external partners and agencies that
16 provide additional services.

17 Q. Are you aware of any programming provided
18 in SAFE Centers that is specific to social media?

19 MR. WALKER: Object to form.

20 THE WITNESS: The programs that are
21 provided in the SAFE Centers, like I said, they
22 are specific to the needs of the students. And
23 so -- social media is definitely a concern for
24 us, and so we see that coming up in
25 conversations, when they're talking about

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1 violence prevention, or talking about human
2 trafficking prevention, talking about safe --
3 safety.

4 And so that comes up in different
5 conversations in the SAFE Centers when providers
6 come.

7 BY MR. REINKE:

8 Q. Okay. So that can come up in connection
9 with individual mental health services that are being
10 provided in a SAFE Center?

11 A. It can come up in individual, yes.

12 Q. Okay. You mentioned that the programs are
13 specific to the needs of the students. Right?

14 A. (Nodding head up and down.)

15 Q. And I guess what I'm trying to understand
16 is if there is a program that is offered in the SAFE
17 Centers that is exclusively focused on social media
18 issues.

19 A. Our programs in schools are not typically
20 just -- like linear in focus, where we can only talk
21 about one thing with students. We need to always
22 give students the opportunity to discuss whatever
23 concerns that they have, whatever concerns they bring
24 to the table. And so we have to be fluid when the
25 students come to us --

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1 Q. Sure.

2 A. -- and make sure we're able to address
3 whatever concern they have.

4 Q. Okay. So then there is no program that's
5 offered in SAFE Centers that is exclusively focused
6 on social media?

7 A. All the programs are -- like I said,
8 they're fluid; and so they may come with the
9 intention of talking about safety, and then if social
10 media comes up in those conversations, we can address
11 safety concerns at that time.

12 Q. Okay. What was your -- well, before we
13 get to that, you also mentioned that SAFE Centers
14 have a role with respect to conflict resolution
15 skills. Explain that.

16 A. We have at -- one of our SAFE Centers, we
17 have a partnership with the King Center for
18 Nonviolence. And so we have representatives that
19 come out to the school to teach children about
20 resolving conflict in a nonviolent way.

21 Q. Okay. Is there any other programming at
22 SAFE Centers related to conflict resolution skills?

23 A. We have -- we have had a partnership with
24 one of the local hospitals around gun violence, and
25 just talking about how to resolve conflicts without

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1 using weapons, without resorting to fighting.

2 Q. Any other programming that you can think
3 of that relates to conflict resolution skills?

4 A. I venture to say all the programming. We
5 have programming around hip-hop lyrics, and we have
6 programming around mindfulness. We have a gardening
7 program that teaches children how to self-reflect.

8 And so we have a lot of different types of
9 programs through the SAFE Centers that are teaching
10 students skills that would help them be more
11 deliberate in their decision-making.

12 Q. You also mentioned a food pantry as a
13 service that SAFE Centers provide. What is the food
14 pantry?

15 A. We have a partnership with the -- one of
16 the food banks, and they provide us with shelf-stable
17 items. And so if a family enrolls in school, they
18 may have just moved into the community, or we have a
19 family that's experiencing homelessness and they may
20 need some food to tide them over, we have food
21 available that we can provide to the family.

22 Q. So this food pantry provides a means of
23 addressing like food insecurity issues?

24 A. It does.

25 Q. And you mentioned a clothing closet as

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1 well. What is the clothing closet?

2 A. A clothing closet has clothes for students
3 that -- that may need clothes for a variety of
4 reasons. There may have been a -- experienced a
5 fire. They may have had to flee a domestic violence
6 situation. They may be homeless. They may have
7 gotten drenched in the rain.

8 It's just -- if a child needs some
9 clothes, we have some clothes available in most of
10 our SAFE Centers.

11 Q. Are these -- the clothing that is
12 available in SAFE Centers, is that clothing that the
13 student -- that a student would borrow? Or do they
14 get to like, you know, take the clothing and keep it?

15 A. They can keep it.

16 Q. Okay. And is that clothing that's like
17 donated from the community?

18 A. We have -- we have a partner that donates
19 items to us that are new. And then we also have some
20 donations.

21 Q. Okay. And who is the partner that donates
22 items?

23 A. It's the Assistance League of Atlanta.

24 Q. Were you involved in the creation of
25 SAFE Centers in the DeKalb County School District?

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1 A. Yes, I was.

2 Q. Okay. What was your role in the creation
3 of SAFE Centers?

4 A. Developing the concept of what the
5 SAFE Center would look like, aesthetically, and
6 hiring the staff members that would work in the
7 SAFE Center, and developing the partnerships for the
8 SAFE Centers to get them started.

9 Q. Were SAFE Centers your idea?

10 A. They were actually the -- the idea of
11 Metro RESA. And they call them "comprehensive school
12 models," and so we just -- every district that has
13 them renames it.

14 Q. How did you find out about this idea of
15 comprehensive school model?

16 A. Through a meeting with Metro RESA.

17 Q. Do you recall when that meeting was?

18 A. It was prepandemic.

19 Q. What do you recall from that meeting?

20 A. It was a meeting with the -- actually
21 Ms. Sandrock from Metro RESA, the deputy -- the
22 deputy superintendent, and a few other team members.

23 And Metro RESA introduced the idea of a
24 comprehensive school model.

25 Q. Okay. And "Ms. Sandrock" is Michelle

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1 Sandrock, who was looking at -- who wrote the e-mail
2 we were looking at previously?

3 A. Yes.

4 Q. You mentioned the deputy superintendent.
5 Was that Dr. Moore-Sanders?

6 A. No. At the time, that was Vasanne
7 Tinsley.

8 Q. Okay. And then you were present in this
9 meeting?

10 A. Yes.

11 Q. As well as several other people from the
12 DeKalb County School District?

13 A. Yes.

14 Q. Do you recall any of those other
15 individuals who were present in this meeting?

16 A. Dr. Moore-Sanders was there. Kishia Towns
17 was there. Our prevention liaison was there. And
18 myself.

19 Q. And who is the prevention liaison?

20 A. Torri Hornsby-Griffin.

21 Q. Is that the position that works in the
22 alternative school?

23 A. Yes.

24 Q. And so after this meeting took place, what
25 was sort of the next step that led to the development

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1 of SAFE Centers in DeKalb County schools?

2 A. We had to identify a site.

3 Q. Identify a school to open a first
4 SAFE Center?

5 A. Yes.

6 Q. Were you involved with the process of
7 identifying which school to open the first
8 SAFE Center in?

9 A. The -- the -- Dr. Vasanne Tinsley, the
10 deputy superintendent at that time, identified the
11 site.

12 Q. Okay. Do you know why she chose the
13 school she did?

14 A. The school had a poor graduation rate.

15 Q. Do you know if there were any other
16 factors in why she chose that school?

17 A. No.

18 Q. And which school was identified as the
19 first site for SAFE Centers?

20 A. Cross Keys High School.

21 Q. And that's a DeKalb County high school?

22 A. Yes, it is.

23 Q. When did the SAFE Center open at Cross
24 Keys High School?

25 A. Maybe the '21-'22 school year; I'm not

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1 sure exactly when.

2 Q. Was it sometime after the pandemic?

3 A. It was.

4 Q. And since that time, has the DeKalb County
5 School District opened additional SAFE Centers?

6 A. Yes, we have.

7 Q. How many SAFE Centers are there currently
8 in the DeKalb County School District?

9 A. Six.

10 Q. And they're all at high schools?

11 A. Yes, they are.

12 Q. Do you know what high schools they're at?

13 A. Yes, I do.

14 Q. Which high schools?

15 A. Cross Keys, McNair, Redan, Stone Mountain,
16 Martin Luther King, and Towers.

17 Q. And do you know how those -- well, let me
18 ask you this: How -- how many high schools are
19 there, total, within the DeKalb County School
20 District?

21 A. I believe there are 23 high schools.

22 Q. Okay. So not all high schools have a
23 SAFE Center?

24 A. That's correct.

25 Q. Do you know how it was chosen which high

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1 schools would have a SAFE Center?

2 A. Those schools were identified as having
3 poor graduation rates.

4 Q. Do you know if there were any other
5 factors in why those schools were chosen to have SAFE
6 Centers?

7 A. That was the primary reason.

8 Q. SAFE Centers are places where students can
9 receive various services, right?

10 A. That's correct.

11 Q. Okay. How does a student access a
12 SAFE Center?

13 A. They can have an appointment, prescheduled
14 appointment, with a provider or a partner. Or they
15 can be referred by their teacher, school counselor,
16 or an administrator in the building.

17 Q. Do SAFE Centers provide any services to
18 students like on a walk-in basis?

19 A. Yes, they do.

20 Q. Okay. So a student can just walk into the
21 SAFE Center and obtain services?

22 A. Yes, they can.

23 Q. Do they need a referral in order to do
24 that?

25 A. They need a pass.

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1 Q. Like a hall pass?

2 A. Yes. Yes.

3 Q. And -- and who would have to provide that
4 pass?

5 A. Wherever the student was coming from.

6 Q. Okay.

7 A. So if they were coming from a teacher or
8 from a -- the media center; it depends where the
9 student is coming from.

10 Q. You also mentioned that students can be
11 referred to SAFE Centers. How does the process for
12 referring a student to a SAFE Center work?

13 A. Through Infinite Campus. Or through an
14 e-mail.

15 Q. And -- and who would refer a student to a
16 SAFE Center?

17 A. Typically a school counselor, an
18 administrator.

19 Q. What would be some of the reasons why a
20 school counselor or administrator would refer a
21 student to the SAFE Center?

22 A. If the student is exhibiting some type of
23 atypical behavior in the classroom. They are
24 starting to notice signs of depression or lack of
25 participation. They may have some attendance

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1 concerns. They may have some behavioral concerns.
2 The teacher wants the child to receive some mental
3 health support, some therapeutic support. It's been
4 brought to the teacher's attention that there are
5 some family concerns about food insecurity, or they
6 need clothing. A parent may have got in contact with
7 the teacher to ask for some additional support for
8 their family.

9 Q. If a student is referred to a SAFE Center
10 by a school counselor or an administrator, are they
11 required to go to the SAFE Center?

12 A. We can't force a child to go to the
13 SAFE Center.

14 Q. All right. But would they, you know, be
15 punished in any way if they didn't go --

16 A. No.

17 Q. -- after a referral?

18 A. No, they would not be punished.

19 Q. Okay.

20 You also mentioned that students can
21 schedule prescheduled appointments for SAFE Centers.
22 How does that process work?

23 A. So if a student is already involved in a
24 group for a partner that's coming out there to
25 conduct a group, like the teen -- teen mother group,

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1 they may have a prescheduled appointment. They know
2 that group is going to meet twice a month, and so
3 they will come down to the SAFE Center during that
4 time to meet with that group.

5 Q. Is that something that would happen during
6 normal school hours?

7 A. Yes.

8 Q. So would a student like miss class time to
9 attend a prescheduled appointment at a SAFE Center?

10 A. Typically not. We typically have the
11 students come in during lunchtime, or during -- some
12 schools -- some high schools have an extended home
13 room period.

14 And so we make every effort to call
15 students during nonacademic time.

16 Q. Okay. But it's possible that a student
17 could be scheduled for an appointment at a
18 SAFE Center during academic time?

19 MR. WALKER: Object to form.

20 THE WITNESS: If there's a student that
21 has some type of concern that's impacting their
22 academic performance that may have caused a
23 suspension and we can have them go to a
24 SAFE Center instead of being suspended from
25 school and do their work in -- in a smaller

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1 environment with less distractions, then we
2 would.

3 BY MR. REINKE:

4 Q. Okay. Are there other circumstances in
5 which students could miss class time to go to SAFE
6 Centers?

7 A. We don't promote missed instruction, and
8 so we're not -- we're not going to create a
9 circumstance for students to intentionally miss
10 instruction.

11 Q. Do SAFE Centers provide services with
12 respect to like figuring -- helping students figure
13 out what they're going to do after they graduate?

14 A. It depends. And so we have other
15 employees in the building that that really is their
16 sole responsibility, which is to help students plan
17 for what they're going to do after graduation.

18 However, if the subject comes up, the
19 SAFE Center personal ambassador will talk to a
20 student about decision-making.

21 Q. Okay. When -- when you refer to these
22 other employees in the building, are you talking
23 about counselors?

24 A. We have counselors.

25 Q. And -- and could counselors provide

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1 services within a SAFE Center?

2 A. Yes. Anyone can come in the SAFE Center
3 and meet with a student.

4 Q. Okay. Do SAFE Centers provide like
5 tutoring services for students?

6 A. Some schools will allow a teacher or a
7 staff member to use that space for tutoring.

8 Q. And SAFE Centers can assist students in
9 dealing with personal issues?

10 A. Yes.

11 Q. They can assist students with dealing with
12 family issues?

13 A. Yes.

14 Q. They can assist students who need access
15 to food?

16 A. Yes.

17 Q. Students who need access to clothing?

18 A. Yes.

19 Q. What about students who need access to
20 school supplies?

21 A. Yes.

22 Q. A SAFE Center can assist with that?

23 A. Yes.

24 Q. It can also assist students who need
25 access to toiletry items?

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1 A. Yes.

2 Q. And what would some of those items
3 include?

4 A. Toothpaste, washcloth, soap, toothbrush,
5 deodorant, combs.

6 Q. And SAFE Centers offer these services
7 during regular school hours?

8 A. Yes, they do.

9 Q. Do they offer any services after school?

10 A. Yes. Some do.

11 Q. And what services would SAFE Centers offer
12 after school?

13 A. If a specific partner has a program after
14 school, then they'll remain and receive those
15 services after school hours.

16 Q. Can you think of any specific examples of
17 programs that have been offered in SAFE Centers after
18 school?

19 A. So we have -- we had a relationship --
20 interpersonal relationship program that was offered
21 during the summer, so that wasn't during normal
22 school hours.

23 Q. And what was that program?

24 A. It was teaching children how to
25 effectively engage with one another in healthy

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1 relationships, healthy communication, respectful
2 communication with one another.

3 Q. And how did the program go about doing
4 that?

5 A. They worked with the football team at the
6 school, and they met with them one day a week for a
7 few weeks.

8 Q. Do SAFE Centers offer any services on
9 weekends?

10 A. The SAFE Center -- they've hosted like
11 prom dress events on the weekend, for students to get
12 prom dresses. They've partnered with a local church
13 to do some theater work with some of the students in
14 the church during the weekends.

15 So it's just depending on what
16 opportunities present themselves that we think would
17 be beneficial for the students.

18 Q. When you talk about a SAFE Center, what
19 does the SAFE Center like physically look like?

20 A. We typically create what we call a
21 Zen Den. And that's a therapeutic room that has --
22 has a -- has a sofa in it, has a chair, has some
23 tables in it. It's carpeted. It's painted in warm
24 colors that are therapeutic.

25 And so we try to create a nurturing

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1 environment in that room, which is calm and relaxing,
2 so that if a student is exhibiting any concerns,
3 here's a place where they can go and decompress.

4 We have another room, referred to as
5 the VIP Suite, and that's where a lot of our group
6 meetings are held, and group sessions are held. So
7 when those partners come in and they want to talk to
8 the students about nonviolence or what have you,
9 they'll meet in the VIP Suite.

10 We have a training room in some of the
11 SAFE Centers where we can do training with students,
12 have a food pantry that's filled with shelves, which
13 is stocked with food. Some have a clothing closet
14 and so there's racks of hangers with clothes on it.

15 Those are the typical rooms in the SAFE
16 Centers.

17 Q. Okay. So a SAFE Center consists of
18 multiple rooms?

19 A. Yes.

20 Q. Are they all kind of like together in like
21 one suite?

22 A. Ideally. It just depends on the space
23 that the school has.

24 Q. Okay. So in some schools they are, but in
25 other schools they are not?

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1 A. Yes.

2 Q. Okay. I'm going to show you a document
3 that we'll mark as Exhibit 10, which is Tab 11.

4 (DeKalb-Revels Exhibit 10 was marked for
5 identification.)

6 MR. REINKE: This is a document that was
7 produced by DeKalb County School District in
8 this case. It's an Excel, so the Bates number
9 didn't print on the page, but the Bates number
10 is DEKALB041700.

11 BY MR. REINKE:

12 Q. And if you could please take a moment to
13 review the document that I've marked as Exhibit 10,
14 and tell me if you recognize this document.

15 A. Yes.

16 Q. Okay. And what is this?

17 A. This is a document that really shows where
18 the rooms are located at McNair High School.

19 Q. In the SAFE Center?

20 A. Uh-huh.

21 Q. Okay. And generally speaking -- you know,
22 there's various rooms listed on this document,
23 correct? So there's a lounge?

24 A. Yes.

25 Q. There's Threadz Night? It says "Threadz"?

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1 A. Yes.

2 Q. What is that?

3 A. That's the clothing closet.

4 Q. Okay. There's "Training Ground"?

5 A. Yes.

6 Q. "Success Center"?

7 A. Yes.

8 Q. "The Hub"?

9 A. Yes.

10 Q. A "Food Pantry"?

11 A. Yes.

12 Q. "Health Services"?

13 A. Yes.

14 Q. The "Zen Den"?

15 A. Yes.

16 Q. "VIP Suite"?

17 A. Yes.

18 Q. And then office and reception area?

19 A. Yes.

20 Q. Generally speaking, do all of the SAFE
21 Centers at the six DeKalb County high schools where
22 there are SAFE Centers include the same rooms that
23 are listed on this exhibit?

24 A. No.

25 Q. And what's -- what differs?

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1 A. They don't have health services located
2 near the SAFE Centers. They don't have a success
3 center located in the SAFE Center. They don't have a
4 hub, the parent hub. And some have training -- they
5 don't have -- they don't have training -- most of
6 them don't have training rooms either.

7 Q. Is the SAFE Center at McNair High School
8 like the largest, in terms of physical space, among
9 the SAFE Centers at DeKalb County schools?

10 A. Yes, it is.

11 Q. Are students permitted to use electronic
12 devices in SAFE Centers?

13 A. That's not what students come to the
14 SAFE Center to do. And so students are not allowed
15 to use their electronic devices while they're in
16 school at all.

17 Q. All right. So they're not allowed to use
18 electronic devices in SAFE Centers?

19 A. They're not allowed to use electronic
20 devices in schools.

21 Q. And that would include SAFE Center --

22 A. That would include SAFE Centers --

23 Q. Okay.

24 A. -- located within the school.

25 Q. Are they allowed to access social media in

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1 SAFE Centers?

2 MR. WALKER: Object to form.

3 THE WITNESS: I'm not sure what each
4 SAFE Center is doing, but I know that as a
5 general rule, in our schools, we -- we don't ask
6 students to access social media; however, if --
7 if a provider is using social media to increase
8 awareness about a specific topic while they're
9 doing a training, there may be an occasion that
10 a student may be asked to access something.

11 BY MR. REINKE:

12 Q. Okay. And are you aware of any instances
13 of providers using social media in SAFE Centers to
14 increase awareness about a particular topic?

15 A. I am not.

16 Q. Okay. I'm going to be showing you a
17 document that we'll mark as Exhibit 11, which is
18 Tab 12.

19 (DeKalb-Revels Exhibit 11 was marked for
20 identification.)

21 BY MR. REINKE:

22 Q. And I recognize this is a fairly lengthy
23 document, but if you could please take a moment to
24 review it, and let me know when you have completed
25 that.

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1 A. Okay.

2 Q. Okay. Do you recognize what this document
3 is?

4 A. Yes.

5 Q. And it's titled "Academic Report Document
6 September 2023" --

7 A. Yes.

8 Q. -- correct?

9 A. It is.

10 Q. And what is that?

11 A. This is a document that we report out on a
12 monthly basis what is going on, and so just some
13 highlights of what's going on in our department.

14 Q. Okay. So various department leaders
15 report on highlights within their departments every
16 month?

17 A. Right.

18 Q. And those highlights are compiled in this
19 document?

20 A. Uh-huh.

21 Q. Yes?

22 A. Yes.

23 Q. Okay. And this is the document for
24 September 2023?

25 A. Yes.

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1 Q. It says "Mrs. Michelle Dillard" at the
2 top. Who is -- who is she?

3 A. She's the chief of schools.

4 Q. And what is the chief of schools?

5 A. She provides leadership to the area
6 superintendents, who are the -- essentially the
7 supervisor for principals.

8 Q. Okay. And so she -- the area
9 superintendents report to her?

10 A. Yes.

11 Q. And is this information in these academic
12 report documents compiled through Mrs. Dillard?

13 A. I'm not sure how Ms. Dillard compiles --
14 has her team compile her information.

15 Q. Okay. But is it your understanding that
16 the leader of each department provides information to
17 somebody on Mrs. Dillard's team to compile into this
18 report?

19 A. I'm not familiar with how another chief
20 compiles their information.

21 Q. Okay. If you turn to the page where the
22 Bates number at the bottom -- that's the number in
23 the bottom right-hand corner -- is DEKALB053215.

24 A. Yes.

25 Q. And you see your name, about a quarter of

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1 the way down the page, correct?

2 A. Yes.

3 Q. This information that's under your name --

4 A. Yes.

5 Q. -- is that information that you provided
6 for this report?

7 A. Yes.

8 Q. Is that information that you drafted?

9 A. My team drafted the information.

10 Q. Okay. And then did you review that
11 information after your team drafted it?

12 A. Yes, I did.

13 Q. And did you approve it being put into this
14 academic report document for September 2023?

15 A. Yes, I did.

16 Q. And at the very bottom of the page,
17 there's a heading called "SAFE Center Story Time"?

18 A. Yes.

19 Q. And then flipping over, there's a
20 paragraph underneath SAFE Center story time, correct?

21 A. Yes.

22 Q. And what is SAFE Center Story Time?

23 A. The SAFE Center liaison from Martin Luther
24 King High School was asked to provide a positive
25 story about her SAFE Center.

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1 Q. Okay. And she provided that to somebody
2 on your team?

3 A. She provided that to me.

4 Q. Okay. And then -- and then you reviewed
5 that?

6 A. Yes.

7 Q. And then you approved it being included in
8 this academic report document?

9 A. Yes, I did.

10 Q. Okay. And her report says, "It's
11 officially fall, school has been back in session a
12 full two months, and the students and staff were
13 extremely excited about the presence of the
14 SAFE Centers in their buildings. Here at MLK Jr.
15 High School, students were in disbelief at how their
16 school transformed overnight (it was longer, but
17 overnight in the students' minds). The SAFE Center
18 has provided them with snacks, a quiet space to chill
19 or vibe on their lunch breaks, and a place to go to
20 get resources such as shoes, hygiene items, school
21 supplies, and clothing. We met several children that
22 admitted that they would not eat in the cafeteria due
23 to social anxiety and phobias. Students that would
24 typically be called "loners" were now in the VIP
25 Suite with various peers listening to YouTube music

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1 with the lights dimmed and having conversations with
2 one another." Did I read that correctly?

3 A. Yes.

4 Q. Okay. So the SAFE Center liaison for MLK
5 High School was reporting that students who would
6 typically be called "loners" were in the VIP Suite
7 listening to YouTube music and interacting with each
8 other?

9 A. Yes.

10 Q. Okay. We've spent a little bit of time
11 here discussing SAFE Centers, and you'd agree with me
12 that SAFE Centers offer a multitude of services to
13 students, correct?

14 A. Yes.

15 Q. And that includes counseling?
16 Yes?

17 A. Yes.

18 Q. And that includes help with food?

19 A. Yes, it does.

20 Q. Help with clothing?

21 A. Yes.

22 Q. Help with toiletry items?

23 A. Yes.

24 Q. Could be academic support?

25 A. Yes.

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1 Q. Is it fair to say that SAFE Centers were
2 not specifically designed to address issues related
3 to social media?

4 A. SAFE Centers were designed to address any
5 concern that the student presents when they come to
6 school.

7 Q. All right.

8 A. So that includes social media concerns.

9 Q. It includes social media concerns, but it
10 includes other concerns as well, correct?

11 A. It includes a lot of different concerns.

12 MR. REINKE: Okay. We can take a break.

13 VIDEOGRAPHER: We're going off the record
14 at 1:58. And this ends Media Unit Number 2.

15 (A recess transpired from 1:58 p.m. until
16 2:20 p.m.)

17 VIDEOGRAPHER: We're back on the record
18 at 2:21. And this begins Media Unit Number 3.

19 BY MR. REINKE:

20 Q. All right, Ms. Revels, before the break,
21 you recall I was asking you questions about
22 discussions you had related to social media in the
23 context of SEL programs in the wake of the COVID-19
24 pandemic?

25 A. Okay.

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1 Q. Do you recall that I was asking you
2 questions about that?

3 A. About SEL programming? Yes.

4 Q. Yes. And do you recall that as part of
5 that discussion, you testified that you had meetings
6 where you discussed social media in that context?

7 A. Yes.

8 Q. Okay. And those meetings that you were
9 describing, were those like regular weekly or monthly
10 meetings with your team?

11 A. Yes.

12 Q. Okay. So they weren't meetings that were
13 called for the specific purpose of discussing social
14 media?

15 A. We had meetings -- if you're referring to
16 our monthly meetings with the team, our monthly team
17 meetings, we had monthly meetings, and they addressed
18 a variety of issues or concerns that would come up in
19 the schools that we felt we needed to address.

20 Q. Okay. And these were meetings that you
21 had like once per month?

22 A. Yes.

23 Q. Okay. Just a regularly scheduled monthly
24 meeting?

25 A. Yes.

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1 Q. Okay. And they discussed a variety of
2 issues, right?

3 A. Yes.

4 Q. So not just social media?

5 A. That's correct. A variety of issues were
6 discussed.

7 Q. Now, we -- we also talked about like the
8 food pantry in SAFE Centers. And I think you
9 testified that that food pantry is a means of
10 addressing students that have food insecurity in the
11 DeKalb County School District, correct?

12 A. Yes.

13 Q. Is it fair to say that a large number of
14 students in the DeKalb County School District are
15 food insecure?

16 MR. WALKER: Object to form.

17 THE WITNESS: We see a significant number
18 of families accessing our food resources that
19 we're able to provide.

20 BY MR. REINKE:

21 Q. And is it true that approximately
22 80 percent of students within the DeKalb County
23 School District are eligible for free or reduced
24 lunch?

25 A. I'm not sure of the exact percentage.

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1 Q. Do you know approximately what that
2 percentage is?

3 A. I know it's over 60 percent, but I'm not
4 sure of the exact number.

5 Q. Would you agree with me that food
6 insecurity can be a source of stress for students?

7 MR. WALKER: Object to form.

8 THE WITNESS: Our students have a lot of
9 forms of stressors. And so when we provide the
10 food, it's really to the family; they can come
11 up and get the food. And so students -- some --
12 some may know of the stressor that their family
13 is facing due to food insecurity, and some
14 families may be able to cover up that insecurity
15 because they can come and get the food
16 themselves.

17 And so we're not asking students to take
18 home a bag of groceries with them on the school
19 bus, because we want to make sure that they're
20 not embarrassed to take food home. And so we
21 try to be really discreet and protect the
22 confidentiality of our families that need food.

23 BY MR. REINKE:

24 Q. Okay. But if -- would you agree with me
25 that if a student is aware of their food insecurity,

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1 that that could cause them stress?

2 MR. WALKER: Object to form.

3 THE WITNESS: If a student is hungry --

4 BY MR. REINKE:

5 Q. Yes.

6 A. -- and had to come to school, that would
7 cause stress.

8 Q. Okay. And -- and then that stress could
9 negatively affect a student's mental health?

10 MR. WALKER: Object to form.

11 THE WITNESS: Students are impacted in a
12 variety of ways. And so food insecurity, not
13 performing well academically; there are a lot of
14 stressors that students experience in school.

15 BY MR. REINKE:

16 Q. Right. And these stressors can negatively
17 affect their mental health as a whole, correct?

18 MR. WALKER: Object to form.

19 THE WITNESS: Yes. All of the stressors
20 that they face.

21 BY MR. REINKE:

22 Q. Now, homelessness is also an issue for
23 some students in the DeKalb County School District;
24 is that correct?

25 A. Yes, it is.

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1 Q. Do you have an estimate of how many
2 students within the DeKalb County School District are
3 homeless?

4 A. We typically have over a thousand students
5 a year that are identified as homeless.

6 Q. And would you agree that homelessness is
7 an issue that could cause students to experience
8 stress?

9 MR. WALKER: Object to form.

10 THE WITNESS: We have a variety of factors
11 that cause stress for our students.

12 Homelessness is one of those factors.

13 BY MR. REINKE:

14 Q. Okay. And -- and that stress associated
15 with students being homeless could negatively affect
16 their mental health?

17 MR. WALKER: Object to form.

18 THE WITNESS: Homelessness and any type of
19 deprivation can cause stress among students.

20 BY MR. REINKE:

21 Q. Right. And then that stress can
22 negatively affect a student's overall mental health;
23 is that --

24 MR. WALKER: Object to form.

25 THE WITNESS: All stressors can impact a

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1 student's mental health.

2 BY MR. REINKE:

3 Q. Are there students within the DeKalb
4 County School District that lack access to health
5 care?

6 A. DeKalb County has health care services
7 that are provided to families in the county, and so
8 they should be able to access health care services.

9 Q. So you've never heard of the lack of
10 access to health care services being an issue among
11 DeKalb County students?

12 A. I've heard that students were not getting
13 the care that they needed, and so my team helped
14 families to access the resources through -- through
15 DeKalb County Health Department, and through filling
16 out forms for health insurance or Medicaid. So part
17 of the role of the social worker is to help families
18 access services.

19 Q. And when you say that you've heard that
20 students were not getting the care that they needed,
21 what do you recall hearing about that?

22 A. They were having difficulty possibly with
23 vaccines, not getting vaccines timely.

24 Q. Are there any other things that you recall
25 learning about students in the DeKalb County School

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1 District with respect to their ability to get health
2 care?

3 A. Really about parents not signing up for
4 Medicaid and letting Medicaid lapse at times.

5 Q. Okay. Are these things that students
6 would be aware of?

7 A. Our younger students may not be aware of
8 it, because their families are really charged with
9 that responsibility. Some of the older students may
10 be aware of it, if their families are sharing with
11 them why they can't go to the doctor.

12 Q. And if a student has awareness of that, is
13 that something that could cause them to experience
14 stress?

15 MR. WALKER: Object to form.

16 THE WITNESS: If a student is having a
17 medical concern that is causing them discomfort,
18 I think anyone that has an uncomfortable medical
19 concern that's causing pain will be under some
20 level of stress.

21 BY MR. REINKE:

22 Q. Right. And that could negatively affect
23 their overall mental health?

24 MR. WALKER: Object to form.

25 THE WITNESS: Anything that's going to

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1 adversely impact the students and the way they
2 feel will have an impact on their mental health.

3 BY MR. REINKE:

4 Q. In your current role at DeKalb County
5 School District, one of your job responsibilities is
6 to lead the social work department, correct?

7 A. Yes, it is.

8 Q. So as the term is used within the DeKalb
9 County School District, what is a school social
10 worker?

11 A. A school social worker is a master-level
12 social worker that handles child welfare concerns for
13 the School District.

14 Q. Okay. When you say "handles child welfare
15 concerns," what are some examples of child welfare
16 concerns that school social workers handle within the
17 DeKalb County School District?

18 A. Issues around child abuse and neglect.
19 Truancy. Suicidal ideation. Discipline concerns.
20 Family concerns. Custody issues. Homelessness.
21 Foster care. Migrant concerns. Teen pregnancy.

22 There's a list of concerns. I'm sure I'm
23 not giving you an exhaustive list of everything
24 that's listed.

25 Q. So social workers within DeKalb County

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1 School District address a wide range of concerns that
2 could affect how students perform in school?

3 A. Yes.

4 Q. And they address a wide range of concerns
5 that could affect students' mental health?

6 A. Yes.

7 Q. What are the job duties of a social
8 worker?

9 A. The duties include looking into cases
10 based on referrals provided by staff members at the
11 school, and determining next steps for families and
12 for students.

13 And so the next steps may include
14 contacting the Department of Family and Children
15 Services, if a mandated report needs to be made. It
16 may include filing a complaint in juvenile court, if
17 there's an attendance concern, or educational neglect
18 complaint for an attendance concern for a younger
19 child. It may include providing some brief
20 supportive counseling, depending on what the needs
21 are of this child. It includes providing crisis
22 support in the case of a death of a student or staff
23 member in the building. It includes doing annual
24 trainings for staff members, and it includes dealing
25 with any issue that creates a barrier to students'

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1 academic success.

2 Q. And these duties that you have just
3 described, that's -- just to be clear -- the duties
4 of a school social worker within the DeKalb County
5 School District?

6 A. Yes, it is.

7 Q. Okay. You mentioned providing brief
8 supportive counseling. How do school social workers
9 within the DeKalb County School District provide
10 brief supportive counseling?

11 A. They'll set up individual meetings with
12 the student.

13 Q. Is there any counseling provided in a
14 group setting by social workers within the DeKalb
15 County School District?

16 A. Some social workers may have a group.

17 Q. Do you have an estimate of the percentage
18 of the time that -- of their time that social workers
19 within the DeKalb County School District spend
20 providing brief supportive counseling to students?

21 A. That would be a large percentage of their
22 time. Probably 75 to 80 percent of their time is
23 with students.

24 Q. And these brief supportive counseling
25 sessions, you mentioned one-on-one sessions, so

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1 let's -- let's start with that.

2 Is there a prescribed amount of time that
3 one of these one-on-one counseling sessions with a
4 social worker in the DeKalb County School District
5 would last?

6 A. No. It depends on the need of the
7 student.

8 Q. Do you have an idea of how long they last,
9 on average?

10 A. It depends on the needs of the student, so
11 I can't make an estimate.

12 Q. All right. So it could vary?

13 A. It does vary, yes.

14 Q. And it varies substantially?

15 A. It can, depending on -- if a student lost
16 a parent, or if a student failed a class. It just
17 depends on what the student is talking about.
18 Because we have to be empathetic to their needs.

19 Q. You also mentioned like group sessions --

20 A. (Nodding head up and down.)

21 Q. -- between DeKalb County students and
22 social workers. Do you know how long those group
23 sessions last?

24 A. A group session would typically last an
25 estimated 40 minutes.

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1 Q. And approximately how many students would
2 be in a group?

3 A. Approximately five students. No more than
4 ten students.

5 Q. You mentioned that social workers within
6 the DeKalb County School District provide annual
7 trainings for staff members. What types of trainings
8 do social workers provide for staff members within
9 the DeKalb County School District?

10 A. It's referred to as a mandated reporter
11 training, and it discusses signs and symptoms to look
12 for in cases of suspected child abuse and neglect.
13 It also covers suicidal ideation, human trafficking,
14 foster care, homelessness, migratory program, and
15 attendance.

16 Q. Are there any other topics that you can
17 think of that are covered by that mandated reporter
18 training?

19 A. Not off the top of my head.

20 Q. So social media is not specifically
21 covered?

22 A. Social media comes up when human
23 trafficking is being discussed.

24 Q. Okay. Is social media part of that
25 mandatory reporter training, other than in connection

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1 with the discussion of human trafficking?

2 A. That's where I recall it coming up.

3 Q. And other than the mandatory -- or
4 mandated reporter training, do social workers within
5 the DeKalb County School District provide any other
6 types of annual trainings to District staff members?

7 A. They provide other trainings, but not
8 other -- no other annual training.

9 Q. Okay. What are the other trainings they
10 provide?

11 A. They may provide a specific training on
12 the topic of human trafficking, just so we're on that
13 topic. They may provide a training on mental health
14 first aid, if they are trained in that area.

15 Q. Are there other trainings that school
16 social workers within the DeKalb County School
17 District provide to District staff members?

18 A. Various social workers are trained in
19 different areas. And so some may be trained in
20 restorative practices or Connections Matter. So
21 there are different trainings that different social
22 workers may have the skill level to redeliver.

23 Q. Are you aware of any social workers within
24 the DeKalb County School District who have specific
25 training related to social media?

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1 A. The trainings can include social media
2 because as you're conducting a training, either to
3 students or parents or community members, questions
4 come up around how do I protect my child? And so
5 that's the area where social media often comes up in
6 the conversation. And so at that point we have to
7 respond to the questions.

8 Q. Okay. But -- but are you aware of any
9 specific social workers within the District that have
10 received like a specific training that is focused
11 solely on social media?

12 A. Social media comes up in training.

13 Q. Right.

14 A. And so it's brought up when we have --
15 when we host trainings. So the social media
16 conversation is often brought up as we're doing
17 trainings. And it's brought up by the participants
18 in the training.

19 Q. And my question is just a little bit
20 different. My question is if you're aware of a
21 particular training given by social workers in the
22 DeKalb County School District that is only focused on
23 social media.

24 MR. WALKER: Object to form.

25 THE WITNESS: We do not have a training

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1 that is solely focused on just one issue in that
2 way. So the trainings are broad, and cover a
3 variety of topics.

4 BY MR. REINKE:

5 Q. Do part of the job duties of -- of school
6 social workers within the DeKalb County School
7 District include addressing student mental health
8 issues?

9 A. Can you restate your question?

10 Q. Sure. Do part of the job duties for
11 social workers within the DeKalb County School
12 District include addressing student mental health
13 issues?

14 A. Yes.

15 Q. And how do social workers within the
16 District address student mental health issues?

17 A. They meet with students, one on one, to
18 assess what the concerns are. And based on that
19 assessment, that assessment, they will make a
20 referral, if needed, to an external resource, one of
21 our mental health partners, or an external resource,
22 based on what the parent is requesting, once they've
23 had a chance to flush out the concern with the
24 parent.

25 Q. Okay. And given the role that student

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1 social workers -- or that school social workers play
2 in addressing student mental health, would you agree
3 that having a shortage of social workers could
4 adversely affect student mental health?

5 MR. WALKER: Object to form.

6 THE WITNESS: We have been advocating to
7 increase the number of social workers in the
8 schools, because we would like to be able to
9 provide more comprehensive services within the
10 schools.

11 BY MR. REINKE:

12 Q. And is that because not having enough
13 social workers could negatively impact student mental
14 health?

15 MR. WALKER: Object to form.

16 THE WITNESS: It's because we know if we
17 have more social workers, we will be able to
18 help more students more quickly.

19 BY MR. REINKE:

20 Q. Okay. So not having enough social workers
21 would not negatively affect student mental health?
22 Is that your testimony?

23 MR. WALKER: Object to form.

24 THE WITNESS: It creates a lag in
25 services. And so social workers are assigned to

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1 multiple schools, and so they -- if they're at
2 one school, then they have to drive to another
3 school once they receive a referral about a
4 concern. And so if we had more social workers,
5 we could address that concern immediately, and
6 not have to wait for someone to drive from one
7 school to the next.

8 BY MR. REINKE:

9 Q. So not having enough social workers
10 creates a lag in services?

11 A. It creates a lag in response time. So the
12 students receive the services, just not as quickly.
13 They may have to wait until a social worker drives
14 between schools to get the service they seek.

15 Q. So students may not receive services as
16 quickly as they otherwise would. Right?

17 A. If -- yeah, because we have social workers
18 at every school now.

19 Q. And could that delay in receiving services
20 negatively impact a student's mental health?

21 MR. WALKER: Object to form.

22 THE WITNESS: We have school counselors at
23 the schools, who are also able to provide
24 services, and they, for the most part, are not
25 assigned to multiple schools. And so students

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1 can receive some level of support before the
2 social worker gets there.

3 BY MR. REINKE:

4 Q. So -- so the delay in a social worker
5 getting to talk to the student does not negatively
6 affect a student's mental health; is that your
7 testimony?

8 A. I would prefer if we had more social
9 workers to deal with issues more rapidly. And so we
10 have school counselors that can fill in the gap until
11 we can get the social worker over to the schools, so
12 students are provided with continuous ongoing
13 support.

14 Q. What's the difference between a school
15 counselor and a school social worker?

16 A. Different training, different degrees.
17 The expectation is a school counselor will do
18 scheduling for students, deal with more of the
19 academic difficulties, and that -- they're dealing
20 more with the -- the issues that occur in school; and
21 the social worker is dealing a lot with the issues
22 that occur outside of school that impact the student
23 in school.

24 And they're both dealing with all of the
25 concerns, because students present with a lot of

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1 concerns. So we have to layer the support that our
2 students receive.

3 Q. Does a school social worker need to have
4 a -- what -- what is the minimum degree requirement
5 for a school social worker?

6 A. A master's degree in social work.

7 Q. And what is a -- the minimum degree
8 requirement for a school counselor in the DeKalb
9 County School District?

10 A. I believe the counselors also have a
11 master's degree in school counseling, or in
12 counseling.

13 Q. How many school social workers are
14 currently employed by the DeKalb County School
15 District?

16 A. I believe it's 65.

17 Q. There's approximately 92,000 students in
18 the District?

19 A. Approximately.

20 Q. You've been working in the social work
21 department in DeKalb County School District since
22 2016, correct?

23 A. Yes, I have.

24 Q. Okay. In the time period that you've been
25 working for the social work department in the DeKalb

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1 County School District, has the number of school
2 social workers employed by the District changed?

3 A. Yes, it has.

4 Q. And how has it changed?

5 A. It's increased.

6 Q. So at the time you started working for the
7 DeKalb County School District, in 2016, how many
8 school social workers did the District employ?

9 A. I believe there were approximately 39
10 to 42 social workers.

11 Q. Are there currently any vacancies within
12 the school social work position in the DeKalb County
13 School District?

14 A. I don't believe there are any vacancies
15 posted right now.

16 Q. So at this time, you're not trying to hire
17 any additional school social workers; is that
18 correct?

19 A. I don't believe we have any positions
20 posted.

21 Q. I'm going to show you a document that
22 we'll mark as Exhibit 12, which is Tab 64.

23 (DeKalb-Revels Exhibit 12 was marked for
24 identification.)
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1 BY MR. REINKE:

2 Q. If you could please take a moment to
3 review the document that I've marked as Exhibit 12,
4 and let me know when you've completed it.

5 A. Yes.

6 Q. Okay. And this is an e-mail from
7 Dr. Moore-Sanders to Cheryl Watson-Harris, correct?

8 A. Yes, it is.

9 Q. And at the time of the e-mail, was Cheryl
10 Watson-Harris the superintendent for DeKalb County
11 schools?

12 A. Yes, she was.

13 Q. And you were copied on this e-mail,
14 correct?

15 A. Yes.

16 Q. The subject of the e-mail is "Staff to
17 Student Ratios."

18 A. Yes.

19 Q. And the e-mail says, "Greetings
20 Mrs. Watson-Harris, Attached is information requested
21 during our meeting with board members Pierce and Hill
22 to support a reduction in the staff to student
23 ratios.

24 "I will be meeting with Mr. Burbridge next
25 week to do a cost analysis for our district to look

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1 at a ratio reduction based on 1 to 500 recommendation
2 as well as a cost analysis for licensed personnel.

3 "If we reduce our social workers and
4 psychologists' school assignments, we will have the
5 staff to offer mental health services in a
6 comprehensive manner."

7 Did I read that correctly?

8 A. Yes.

9 Q. Do you recall having discussions with
10 Dr. Moore-Sanders, around January 14th of 2022, about
11 the ratio of students to social workers in the DeKalb
12 County School District?

13 A. Yes.

14 Q. And what do you recall about those
15 discussions?

16 A. We discussed wanting to increase the
17 number of school social workers.

18 Q. And do you recall, did you discuss the
19 reasons why you wanted to increase the number of
20 social workers?

21 A. Yes.

22 Q. And what were those reasons?

23 A. To decrease the workload for the social
24 workers and provide more services to students.

25 Q. Provide more of what types of services to

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1 students?

2 A. More mental health support to students.

3 Q. Okay. I'm going to show you a document
4 that we will mark as Exhibit 13, which is Tab 30,
5 which is the attachment to the e-mail we just looked
6 at.

7 (DeKalb-Revels Exhibit 13 was marked for
8 identification.)

9 BY MR. REINKE:

10 Q. And if you could please take a moment to
11 review Exhibit 13, and tell me when you have finished
12 your review.

13 A. Okay.

14 Q. Have you finished reviewing the document?

15 A. Yes.

16 Q. Okay. And about halfway down the first
17 page, there's a heading that says "Psychological
18 Services Department"?

19 A. Yes.

20 Q. Have you worked in the Psychological
21 Services Department at any point in time when you've
22 been employed by the DeKalb County School District?

23 A. I have never worked in that department.

24 Q. Have you ever supervised that department
25 in the time that you've been employed at the DeKalb

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1 County School District?

2 A. Yes, I have.

3 Q. In which role?

4 A. At a director.

5 Q. So in your current role?

6 A. Yes.

7 Q. So in your current role, you have
8 supervisory authority over the Psychological Services
9 Department?

10 A. Not anymore.

11 Q. During what time period did you have
12 supervisory authority over the Psychological Services
13 Department?

14 A. When I first assumed the -- the position,
15 in September 2022, for a little under a year. But I
16 don't remember the exact time frame when -- when the
17 new superintendent came, he reorganized the
18 departments.

19 Q. Okay. And -- and when you say "the new
20 superintendent," who are you referring to?

21 A. Our current superintendent, Dr. Horton.

22 Q. Okay. So -- so once Dr. Horton took over
23 at superintendent of the DeKalb County School
24 District, he reorganized departments, and you no
25 longer had supervisory authority over the

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1 Psychological Services Department?

2 A. That's correct.

3 Q. After that reorganization, who had
4 supervisory authority over the Psychological Services
5 Department?

6 A. Student Services. So Norman Sauce's
7 department, or division. Norman Sauce's division.

8 Q. And do you know why this reorganization
9 took place?

10 A. Because the Psychological Services
11 Department is responsible for testing students for
12 special education, and special education falls within
13 the Student Services Department.

14 Q. Do you know if there were any other
15 reasons why the reorganization took place?

16 A. No.

17 Q. If you flip to the next page, a little bit
18 more than halfway down, after the second chart,
19 there's a heading that says "School Social Work
20 Department." Do you see that?

21 A. Yes.

22 Q. And that is a department that you do
23 supervise today, correct?

24 A. Yes, it is.

25 Q. And that's a department that you have

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1 worked in or supervised for the entire time that you
2 have been employed by the DeKalb County School
3 District, correct?

4 A. Yes.

5 Q. Underneath the heading "School Social Work
6 Department," it says, "The School Social Work
7 Department is comprised of 40 master's level,
8 school-based social workers, and 2 homeless social
9 work liaisons. SSWs are assigned between three to
10 five schools and the department handles approximately
11 12,600 student referrals annually."

12 The data provided in those sentences that
13 I just read, is that consistent with your
14 recollection of the number of school social workers
15 that were employed by the DeKalb County School
16 District in January of 2022?

17 A. Yes.

18 Q. Is it consistent with your recollection
19 that school social workers were assigned between
20 three to five schools around the time frame of
21 January of 2022?

22 A. Yes.

23 Q. And currently, within the School Social
24 Work Department, how many schools are school social
25 workers assigned?

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1 A. They're currently assigned between two and
2 three schools.

3 Q. This paragraph also says that "the
4 department handles approximately 12,600 student
5 referrals annually." Is that consistent with your
6 recollection of the number of annual referrals that
7 the School Social Work Department handled around the
8 time frame of January 2022?

9 A. Yes, it is.

10 Q. And do you know how many annual referrals
11 the School Social Work Department handles today?

12 A. I do not.

13 Q. Do you know if it's more or less than
14 12,600?

15 A. I do not.

16 Q. The paragraph goes on to state, "Social
17 work referrals are divided into 21 categories to
18 accurately account for the work." Correct?

19 A. Yes.

20 Q. And then it lists the -- well, it says
21 then "The categories include the following:
22 attendance, academic, drug abuse, economic,
23 emotional/mental health, family, foster care, group,
24 guardianship, health, homeless, human trafficking,
25 migrant, pregnancy, purposity, school discipline,

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1 special education, staff allegation, suicidal
2 ideation, suspected abuse/neglect, and suspected
3 sexual abuse." Correct?

4 A. Yes.

5 Q. Were those the 21 categories of social
6 work referrals for the Social Work Department as of
7 January 2022?

8 A. Yes.

9 Q. Okay. And are those still the same
10 categories today?

11 A. The Social Work Department is led by
12 Shelly Bishop, and so I provide supervision to
13 Ms. Bishop. And so she may have added another
14 category that I'm not aware of.

15 Q. Okay. But you're not aware of any
16 additional categories today, other than what's listed
17 in here?

18 A. I'm not.

19 Q. Okay. Social media is not one of the
20 categories, is it?

21 A. It's not a category that is listed.
22 However, we know that it has an impact on some of the
23 categories that are listed.

24 Q. Right. But because it's not a separate
25 category, Social Work Department doesn't separately

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1 track the number of referrals that are related to
2 social media, correct?

3 A. We don't track it in Infinite Campus, the
4 way these other categories are tracked. But we have
5 a responsibility to look at underlying issues when we
6 receive referrals. And so it may come out as an
7 underlying issue when we receive a referral.

8 Q. Okay. So it may come out, depending on
9 the circumstances of an individual case?

10 A. Yes.

11 Q. Okay. But is there any data that you're
12 aware of that the Social Work Department has
13 tabulated to track the number of cases where social
14 media has been an issue?

15 MR. WALKER: Object to form.

16 THE WITNESS: The Social Work Department
17 has anecdotal data in regards to the impact of
18 social media, and we have also conducted
19 meetings where social media has come up as a
20 concern for the School District. We know that
21 it has an impact on creating distractions in the
22 classroom, which has an adverse impact on
23 academic performance among our students.

24 BY MR. REINKE:

25 Q. Are you aware of any numerical data that

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1 provides the number of social work referrals within
2 the DeKalb County School District that are related to
3 social media?

4 A. We would need to search for that type of
5 data, so -- I'm not aware of any numerical data.
6 However, I am aware of anecdotal data.

7 Q. Have you ever conducted a search for that
8 type of data?

9 A. I have not conducted that type of a
10 search.

11 Q. Are you aware of anybody else within the
12 DeKalb County School District who has conducted that
13 type of a search?

14 A. I am not aware of anyone conducting a
15 search for that. However, I know our discipline
16 platform infinite Campus may be an avenue to
17 determine whether social media has been the source of
18 referrals for discipline or behavioral health
19 concerns.

20 Q. Have you ever conducted a search in the
21 discipline data in Infinite Campus to try to
22 determine that?

23 A. I have not.

24 Q. Do you know if anybody else has?

25 A. I know that Darnell Logan has conducted

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1 research around the use and the impact of social
2 media in his inquiry into what type of platform or
3 device we would need to use in order to curb the use
4 of social media amongst students in classrooms, which
5 led us to the decision to purchase the Yondr pouches
6 and the lockers, cell phone lockers, for students.

7 Q. Okay. And so -- so your knowledge of
8 that, of what Mr. Logan had done, is based on your
9 participation in the committee related to the Yondr
10 program?

11 A. Yes, it is.

12 Q. Okay. Other than that, are you aware of
13 anybody else within the DeKalb County School District
14 who has ever searched for incidents of discipline
15 related to social media in Infinite Campus?

16 A. No, I'm not aware of any.

17 Q. You -- you testified about anecdotal data,
18 that there's anecdotal data related to social media
19 playing a factor in social work referrals. Do you
20 call that -- do you recall that?

21 A. Yes.

22 Q. What anecdotal data are you referring to?

23 A. We have situations where social workers
24 have received concerns from teachers that have come
25 up due to the usage of social media in classrooms,

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1 due to children being distracted in class and not
2 receiving instruction, due to teachers having to
3 constantly stop instruction in order to redirect
4 students.

5 Q. Okay. As you sit here today, can you name
6 any specific teachers who have raised that concern?

7 A. I can name social workers who have had
8 concerns.

9 Q. Okay. And who are those social workers?

10 A. Chamika Allen, at McNair High School.
11 Deltrice Roberts-Wortham, at Southwest DeKalb High
12 School. Naomi Hemphill, at Martin Luther King High
13 School. Gloria Leslie; she was the former social
14 worker at Redan High School.

15 We've had -- we have about 40 social
16 workers, and so at one time or another, many of the
17 social workers have expressed concerns, because
18 they've been called upon to deal with concerns that
19 have come out of students exhibiting addictive
20 behavior related to social media use.

21 I've actually witnessed for myself a
22 student that has become completely dysregulated once
23 her -- her use of a social media was stopped in
24 school. And her phone was taken away from her, and
25 she began to have a verbal and physical outburst in

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1 the main office, and was screaming that she needed
2 her device back, over at McNair High School.

3 Q. You say you witnessed this for yourself.
4 So you were personally present when this happened?

5 A. I was.

6 Q. Okay. And tell me about what happened.

7 A. I was walking past the main office, and a
8 young lady was screaming in the main office. And so
9 I -- I approached the office to see if I could
10 provide assistance; and when I got to the main
11 office, she was knocking things off of the main
12 counter in the office and tearing paper off the wall,
13 off the bulletin board in the office.

14 And one of the police officers was
15 standing in the office at the time. And I looked at
16 him and asked what was going on. He said, "We've
17 confiscated her cell phone."

18 And she was screaming on the top of her
19 lungs that she wanted her phone back.

20 Q. Okay. And you -- you heard her screaming
21 that?

22 A. Yes.

23 Q. What specifically was she saying?

24 A. "Give me my" -- curse word -- "phone."

25 Q. Did she say anything about social media?

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1 A. Well, we know that it's not the plastic
2 phone that she's screaming about. We know it's the
3 access to social media platforms that's creating that
4 type of adverse severe reaction.

5 Q. My question was, did she say anything
6 about social media?

7 A. She said "Give me my phone back." And so
8 even though she did not directly say the word, "Give
9 me my social media back," we know that that's what --
10 what caused that type of addictive behavior and
11 response, and that compulsion, and that
12 anxiety-provoking response.

13 Q. You heard this student screaming. Did you
14 ever talk to this student, one on one?

15 A. I did not. The police ended up taking her
16 into another room.

17 Q. Okay. And so after you observed this
18 incident, you never followed up with this student for
19 a one-on-one consultation?

20 A. I didn't. No, the police took custody of
21 her and called the parents.

22 Q. So you never asked this student why she
23 reacted the way she did when her phone was taken
24 away?

25 A. I could see, based on her behavior, that

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1 she was having a physiological response to the phone
2 being taken away. And so I could see that she was
3 exhibiting signs of someone that was going through
4 some level of anxiety and extreme stress from her
5 phone being taken away.

6 She was breathing hard. She was having
7 erratic behavior. She was screaming at the top of
8 her lungs. She was acting out physically, destroying
9 property.

10 Q. But you never had a consultation with her
11 to understand why she was exhibiting that kind of
12 behavior, correct?

13 MR. WALKER: Object to form.

14 THE WITNESS: I did not have a
15 consultation with her.

16 BY MR. REINKE:

17 Q. Okay. And she never said anything to you
18 about the reasons why she was reacting that way,
19 correct?

20 A. I don't know the student personally,
21 because I don't work at that school. So that student
22 would not have a reason to come and seek me out to
23 explain what was going on.

24 Q. Right. So she never said anything to you
25 about that, right?

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1 A. I did not have a discussion with the
2 student about it.

3 Q. She didn't say, for example, that she was
4 anxious because she wouldn't be able to access social
5 media, as opposed to not being able to get in touch
6 with somebody in case of an emergency? She didn't
7 say anything like that, right?

8 MR. WALKER: Object to form.

9 THE WITNESS: It was clear that the
10 student was having a physical and emotional
11 reaction to her phone being taken away. And she
12 was screaming, "I want my phone back." And so
13 it was clear that she was having an episode.
14 She would -- had become completely dysregulated
15 because she didn't have access to her phone
16 anymore.

17 BY MR. REINKE:

18 Q. Right. And -- and without access to her
19 phone, she wouldn't be able to use her phone to
20 contact somebody in an emergency, right?

21 MR. WALKER: Object to form.

22 THE WITNESS: We have phones in the
23 school, throughout the school, that any student
24 can access if they needed to contact someone, so
25 -- we have phones in the main office; we have

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1 phones in all of our administrator offices. And
2 so students are able to make contact with family
3 members if they need to use a phone.

4 And that's actually how parents get in
5 contact with their students as well. They're
6 able to call the main office and get in contact
7 with their students.

8 BY MR. REINKE:

9 Q. Do you know that she knew that?

10 A. All of our students know that.

11 Q. So you know for a fact that she knew that
12 she had access to other phones?

13 A. Every student knows that they have access
14 to phones in the main office. That's how we get in
15 contact with their families. That's how their
16 families contact them.

17 Q. You never asked her that, though, did you?

18 A. I did not talk to that student
19 individually.

20 Q. Okay. And to be clear, that student never
21 told you that not having access to social media was
22 the reason that she reacted that way, correct?

23 MR. WALKER: Object to form.

24 THE WITNESS: It was clear that the
25 student was having an episode --

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1 BY MR. REINKE:

2 Q. Right.

3 A. -- based on that phone taken away from
4 her, because she was screaming out: "Give me my" --
5 curse word -- "phone back."

6 Q. Right. I understand what you observed of
7 the student. But my question was, that student never
8 told you that she was reacting that way because
9 taking her phone away meant that she would not have
10 access to social media?

11 MR. WALKER: Object to form.

12 THE WITNESS: Based on my experience as a
13 mental health professional, it was clear that
14 that student had become completely dysregulated,
15 and she was exhibiting signs of extreme
16 distress, and she was having an episode where
17 she was unable to manage her behavior.

18 And it was classic behavior of someone
19 with an addiction. It was the compulsion, the
20 acting out, the disregard for consequences, and
21 the inability to regulate herself and control
22 herself.

23 BY MR. REINKE:

24 Q. And my question was, did she ever tell you
25 that she was reacting the way that she was because

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1 when her phone was taken away, she would not have
2 access to social media?

3 MR. WALKER: Object to form.

4 THE WITNESS: As a mental health
5 professional, I oftentimes have to make
6 assessments of students and the way they're
7 acting, and they're providing us with verbal or
8 nonverbal cues of their behavior; I need to make
9 an assessment.

10 MR. REINKE: I'm going to object as
11 nonresponsive.

12 BY MR. REINKE:

13 Q. My question was, did she tell you that she
14 was reacting in the way that she did because she --
15 when her phone was taken away, she would, no, longer
16 have access to social media?

17 MR. WALKER: Object to form.

18 THE WITNESS: The student provided
19 nonverbal cues that she was having a mental
20 health episode.

21 BY MR. REINKE:

22 Q. What's a nonverbal cue that -- strike
23 that.

24 She didn't say anything verbally to you
25 about the reasons why she was having that episode,

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1 correct?

2 A. I did not meet individually with the
3 student.

4 Q. So she did not say anything verbally to
5 you, because you didn't meet individually with her,
6 correct?

7 MR. WALKER: Object to form.

8 THE WITNESS: Her comments were not
9 directed towards anyone particularly. She was
10 screaming out at the office.

11 BY MR. REINKE:

12 Q. Right. And none of the comments -- she
13 never mentioned social media, correct?

14 A. She mentioned her phone.

15 Q. Okay. But not specifically social media?

16 MR. WALKER: Object to form.

17 THE WITNESS: She mentioned her phone.

18 BY MR. REINKE:

19 Q. But did she specifically mention social
20 media? Yes or no?

21 A. She did not mention social media.

22 Q. Okay. You also mentioned -- well, other
23 than that incident, have you personally witnessed any
24 other incidents of a student mental health crisis
25 that you believe is related to social media?

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1 A. I've observed teachers having to redirect
2 students when I went in the classroom to do
3 observations for the human trafficking curriculum,
4 and teachers having to repeatedly redirect their
5 students to get off of their phones while the
6 curriculum was being taught in the classroom, at the
7 schools that I visited. So those are the direct
8 experiences that I've had.

9 Q. Okay. So you haven't witnessed another
10 student having a mental health crisis as a result
11 of -- or due to what you believe is social media?

12 A. I have not personally witnessed, although
13 my staff have brought concerns to my attention.

14 Q. Okay. Do you recall any specific concerns
15 that your staff brought to your attention about that?

16 A. Staff members have brought concerns around
17 human trafficking issues coming up, and students --
18 or adults having access to students. And that's
19 created -- caused concern for parents, as well as
20 staff members at school.

21 Q. Okay. And -- but would you agree with me
22 that those concerns could arise being online
23 generally?

24 MR. WALKER: Object to form.

25 THE WITNESS: So students -- I guess, in

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1 the area of human trafficking, there -- there
2 aren't enough controls where we can ensure that
3 students are in a safe environment, and that
4 adults are not targeting young people in order
5 to exploit them.

6 BY MR. REINKE:

7 Q. You mentioned human trafficking, right?
8 You believe that that's something that students could
9 experience as a result of being on social media?

10 A. Can you restate your question?

11 Q. Yeah. Do you believe that students could
12 experience human trafficking as a result of being on
13 social media?

14 A. Students are in contact with adults
15 inappropriately.

16 Q. Okay. And social media is one of the ways
17 in which students could get in contact with adults
18 inappropriately?

19 A. And vice versa, yes.

20 Q. Right. But there's other ways in which
21 students could get in contact with adults
22 inappropriately, or adults could get in contact with
23 students inappropriately, correct?

24 A. Social media provides an easy way for
25 adults to gain access to students.

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1 Q. But there are other ways in which adults
2 can gain access to students. You'd agree with that,
3 right?

4 A. Adults can gain access to students in
5 multiple ways.

6 Q. Okay. And that could include like online
7 dating apps, for example?

8 A. I'm not familiar with students using
9 online dating apps.

10 Q. Okay.

11 A. I'm just not familiar with online.

12 Q. But that is a possible way -- you'd agree
13 that that's a possible way that an adult could get in
14 contact with a student, right?

15 MR. WALKER: Object to form.

16 THE WITNESS: I'm not sure of what
17 controls are on online dating apps. I've never
18 used an online dating app.

19 BY MR. REINKE:

20 Q. And an adult could get in touch with a
21 student by text messaging?

22 A. Adult can get in contact with a student
23 via a lot of different methods.

24 Q. You've testified about anecdotal data of
25 discussions with social workers in the DeKalb County

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1 School District and issues they've been dealing with
2 with respect to social media. Are you aware of any
3 written documentation of this anecdotal data?

4 A. Not that I can recollect at the moment.

5 Q. Okay. You've also testified that you've
6 conducted meetings with social workers where social
7 media has come up, right? Do you recall that
8 testimony?

9 A. Yes.

10 Q. Are these -- do you regularly meet with
11 social workers that work in the social worker
12 department?

13 A. Not in this current role, no.

14 Q. Okay. What -- what meetings are you
15 referring to?

16 A. So when I was the coordinator --

17 Q. Okay.

18 A. -- I had monthly meetings.

19 Q. Okay. So this was -- when you testified
20 that you were part of meetings where social media had
21 come up, those were the monthly meetings when you
22 were the coordinator?

23 A. Yes.

24 Q. Okay.

25 Okay, if we can go back to the Exhibit 13,

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1 which is the document we were previously looking at.

2 A. Is that --

3 Q. Yes, that's the one you have in front of
4 you.

5 A. Okay.

6 Q. The very last paragraph under "School
7 Social Work Department" says, "Based on both current
8 and historical data, the highest need has been in the
9 areas of: Attendance concerns, economic need,
10 family-related matters, homelessness, and
11 emotional/mental health support."

12 Did I read that correctly?

13 A. Yes.

14 Q. Is that consistent with your recollection
15 of the areas of highest need for the social -- for
16 social workers in the DeKalb County School District
17 as of January 14th, 2022?

18 A. Yes.

19 Q. And is that still the areas of highest
20 need for social workers in this -- in the school
21 Social Work Department today?

22 A. As I indicated, I don't directly supervise
23 them anymore, and so I cannot confirm whether those
24 areas are still the highest-need areas in the
25 department.

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1 Q. Okay. If you flip over to the next page,
2 please.

3 There is a chart that is labeled with the
4 heading "School Social Worker to Student Ratio,"
5 correct?

6 A. Yes.

7 Q. And then the column on the left says,
8 "National Association of School" -- excuse me; I read
9 that wrong.

10 "National Association of Social Workers
11 (NASW) recommended ratio." Correct?

12 A. Yes.

13 Q. Are you familiar with the National
14 Association of Social Workers?

15 A. Yes.

16 Q. What is that organization?

17 A. It's the professional organization for
18 social workers across the country. And so they have
19 different areas of focus, like social workers that
20 work at hospitals, in prisons, in schools in
21 different areas, and they outline social work ethics
22 in that professional organization, and host
23 conferences.

24 Q. And are you familiar with the recommended
25 ratio that's set forth in this chart?

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1 A. I've seen that information before.

2 Q. Okay. So the National Association of
3 Social Workers recommends that there be 1 social
4 worker for every 250 students. Correct?

5 A. Yes.

6 Q. And the ratio for DeKalb County School
7 District -- as of the time of this memo, which was
8 January 14th, 2022 -- is listed as 1 social worker
9 for ever 2,353 students, correct?

10 A. Yes.

11 MR. REINKE: Okay. We're at a good
12 stopping point. We've been going about an hour,
13 so let's take a break.

14 VIDEOGRAPHER: We're going off the record
15 at 3:17.

16 (A recess transpired from 3:17 p.m. until
17 3:46 p.m.)

18 VIDEOGRAPHER: We're back on the record
19 at 3:46.

20 BY MR. REINKE:

21 Q. All right, Ms. Revels, as part of your
22 employment at the DeKalb County School District, has
23 your job included -- included applying for grants to
24 try to obtain resources to address student mental
25 health issues?

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1 A. Yes.

2 Q. Okay. And is that part of your job in
3 your current role?

4 A. We have a grants department, and so I
5 provide assistance to the grants department if they
6 bring a grant to my attention.

7 Q. Okay. And you do that in your current
8 role?

9 A. I do.

10 Q. As director of Wrap Around Services?

11 A. Yes.

12 Q. Did you also do that, provide assistance
13 to the grant department, when you were a coordinator?

14 A. Yes, I did.

15 Q. Okay. So that's something you've done
16 since you began your employment at the District?

17 A. As a coordinator and as a director. I
18 don't recall doing that as a lead social worker, when
19 I was initially hired.

20 Q. Okay. As you sit here today, can you
21 recall any specific grant application where social
22 media is specifically mentioned as one of the reasons
23 why DeKalb County School District is seeking the
24 funds?

25 A. No, I cannot recall any specific grants.

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1 Q. Would you agree with me that as a licensed
2 social worker, your role is not to diagnose a
3 particular condition?

4 A. Right. I don't diagnose --

5 Q. Right.

6 A. -- in school.

7 Q. Okay. So you've never diagnosed any
8 DeKalb County School District student with any mental
9 health condition, correct?

10 A. I don't diagnose students in school.
11 That's correct.

12 Q. Okay. In your current position at DeKalb
13 County School District, do you use social media in
14 your professional capacity?

15 A. Personally, I do not. My team members do.

16 Q. Okay. How does your team use social
17 media?

18 A. To increase awareness around -- like if
19 it's Child Abuse Prevention Month, or if there's a
20 Human Trafficking Prevention Month. Just various --
21 like topics or meetings to increase awareness.

22 Q. Do you know what social media platforms
23 your team uses for that purpose?

24 A. I believe they use Instagram and Facebook.

25 Q. Do you know if they use any other social

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1 media platforms for that purpose?

2 A. I'm not sure if they do, but those are the
3 two that I'm familiar with that I know that they use.

4 Q. Okay. In your prior position, when you
5 were coordinator of social work services for DeKalb
6 County School District, did you use social media in
7 your professional capacity?

8 A. I did. Yes, I did.

9 Q. And how did -- do you recall what
10 platforms you used when you were in that position?

11 A. I believe I would post on Facebook, and
12 then it may automatically post on Instagram -- I'm
13 not 100 percent sure, but I know those platforms are
14 used.

15 Q. Okay. So you recall posting specifically
16 on Facebook in your professional capacity as
17 coordinator of social work services?

18 A. I believe it was either Facebook or
19 Instagram, because I think they both communicate with
20 one another.

21 Q. Okay. And for what purpose did you use
22 Facebook and Instagram when you were coordinator of
23 social work services for the DeKalb County School
24 District?

25 A. To promote the good work that the social

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1 workers were doing.

2 Q. Can you recall any specific examples of
3 good work that you promoted on social media?

4 A. Possibly around Social Work Month, which
5 is in March every year. So I may have posted about
6 that. I'm not 100 percent sure, but that would be a
7 typical time when we would highlight some of the
8 work.

9 Q. Okay. And do you recall any specific
10 posts that you made on social media?

11 A. I don't. I haven't -- I haven't posted
12 since I was in the position.

13 Q. In your role as lead of social work
14 services, did you use social media in your
15 professional capacity?

16 A. That was some time ago. I may have. But
17 I can't specifically recall what I would have posted.

18 Q. Okay. Do you recall if there were any
19 specific platforms that you used in that role?

20 A. It would have been the same platform.
21 Either Facebook or Instagram.

22 Q. All right. Ms. Revels, thank you for your
23 time today. I don't have any further questions for
24 you at this time, but I will . . .

25 MR. REINKE: I guess we should see if any

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1 of my co-defendant's counsel have questions for
2 you, on Zoom or in person.

3 MS. STRUEBY: I don't have anything.

4 MR. REINKE: Does anybody on Zoom have --

5 MS. SPRAGUE: Nothing for Snap.

6 MR. REINKE: Thanks.

7 MS. SPRAGUE: Thanks.

8 MR. REINKE: Okay.

9 MR. WALKER: Can we take another quick
10 break? And then I'll have some questions.

11 MR. REINKE: Sure.

12 VIDEOGRAPHER: We are going off the record
13 at 3:52.

14 (A recess transpired from 3:52 p.m. until
15 4:03 p.m.)

16 VIDEOGRAPHER: We're back on the record
17 at 4:03.

18 MR. REINKE: And while we were off the
19 record, we agreed that an objection on behalf of
20 one Defendant will count as an objection for
21 all.

22 MR. WALKER: Agreed.

23 EXAMINATION

24 BY MR. WALKER:

25 Q. All right, Ms. Revels, thank you for your

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1 patience today. I've got just a few questions for
2 you.

3 Do you recall discussing the
4 student-to-social-worker ratio in DeKalb County
5 School District?

6 A. Yes, I do.

7 Q. And do you recall testifying today that
8 DeKalb wants to increase the number of social workers
9 so it can provide more services to students?

10 MR. REINKE: Object to the form.

11 THE WITNESS: Yes.

12 BY MR. WALKER:

13 Q. Why does DeKalb want to increase the
14 number of social workers?

15 A. We would like to have at least one social
16 worker assigned to every school, in order to deal
17 with our mental health concerns that we've been
18 seeing in schools and our -- our observing the
19 pervasive issue that social media has been causing
20 among students in schools. And the increased
21 distractions in class that are caused by social media
22 has warranted that we increase services to deal with
23 the stressors that cause the addiction of the
24 students scrolling on social media, in addition to
25 other concerns that students have presented with.

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1 Q. Based on your knowledge, does DeKalb have
2 the funds to hire these additional social workers?

3 MR. REINKE: Object to form.

4 THE WITNESS: We do not.

5 BY MR. WALKER:

6 Q. Do you recall providing testimony about
7 the Infinite Campus reporting system?

8 A. Yes.

9 Q. Is every instance of a teacher or a social
10 worker or another DeKalb staff member dealing with a
11 student's use of social media in class documented in
12 Infinite Campus?

13 MR. REINKE: Form.

14 THE WITNESS: That would be impossible for
15 us to do, because the issue is so pervasive that
16 if we had staff members stop to document every
17 single time they had to redirect a student to
18 put away and stop scrolling social media
19 platforms, it would take away from instruction,
20 and that's all we would spend our whole day
21 doing, would be documenting having to redirect
22 students about putting away their devices and
23 getting off of social media platforms.

24 MR. WALKER: Thank you, Mrs. Revels. I
25 don't have any other questions.

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1 MR. REINKE: No questions from Defendants.
2 Thanks.

3 VIDEOGRAPHER: This concludes the
4 video-recorded deposition of Denise Revels on
5 April 18th, 2025.

6 And we're going to go off the video record
7 at 4:05 p.m.

8 (Discussion off the record.)

9 VIDEOGRAPHER: We're back on the record
10 at 4:07. And I erroneously omitted the total
11 times on the record.

12 Mr. Reinke was on the record for 4 hours
13 and 42 minutes, and Mr. Walker was on the record
14 for 2 minutes total.

15 Now we're going off the record at 4:07,
16 for the conclusion of the deposition of Denise
17 Revels on April 18th, 2025.

18 (Time Noted: 4:07 p.m.)
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